

1 IN THE UNITED STATES DISTRICT COURT

2
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 RICHMOND DIVISION

5 ROBERT DAVID STEELE, et al.,

6 Plaintiff,

7 vs.

8 JASON GOODMAN, et al.,

9 Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S AMENDED RESPONSE TO
PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

11 **DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11**
12 **SANCTIONS**

13
14 Comes now, Defendant Goodman, Pro Se, with this amended response to Plaintiff's
15 motion for Rule 11 sanctions. This amendment is intended to clarify points raised in Plaintiff's
16 reply and address new information that has come to light since the filing of the initial response to
17 Plaintiff's motion for rule 11 sanctions. Additional evidence of the alleged conspiracy, including
18 strong evidence from multiple unrelated third parties has come to light indicating that counsel for
19 Plaintiff and his wife Tanya Cornwell have directly engaged in barratry, a violation of Virginia
20 State Law § 18.2-45 by aggressively and repeatedly enticing individuals to bring suit against
21 Defendant and others based on false claims. It is Defendant's belief that counsel for Plaintiff
22 engages in barratry as a matter of regular practice and has done the same in the case of Devin
23 Nunes v Twitter et al. Further evidence of additional inappropriate action has come to light and
24 will be described in this pleading.
25
26
27
28

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 1

FACTUAL BACKGROUND

1. Plaintiff's Motion for rule 11 sanctions begins asserting the Defendant had "made a fool of himself". This is a statement of opinion and sets an unprofessional, insulting tone for the motion and is an entirely provocative act. It is Defendant's belief this was calculated to elicit the response it got. Plaintiff is suborning behavior he considers sanctionable.
2. According to Merriam-Webster.com the historic, clinical definition of an "idiot" is someone whose "mental development never exceeds that of a normal child". To describe a public figure who proclaims NASA has enslaved children on Mars as an idiot is a clearly understood matter of opinion and although it may hurt Plaintiff's feelings, this and similar statements are protected first amendment speech.
3. Plaintiff has publicly stated, without evidence, *"we actually believe that there is a colony on Mars that is populated by children who were kidnapped and sent into space on a 20 year ride. So that once they get to Mars, they have no alternative but to be slaves on the Mars colony."* This has been previously cited as evidence in this legal matter and reprinted in newspapers and websites around the country. While this might be a statement one could expect a normal, as yet uneducated, or otherwise fanciful child to make, it is not something we would reasonably expect a well-adjusted adult to say, particularly not in a public forum on a broadcast to millions. It remains Defendant's belief that only a person with no ability to differentiate fact from fantasy, possibly with severe mental illness or otherwise defined as a real idiot would make such a statement.
4. Plaintiff and his attorney have acted in a manner which relies on intimidation, threats and initiation of legal action as a method of attack and to achieve political goals rather than seeking relief for real damages. In a video interview with social media personality David

1 Seaman, Plaintiff clearly articulates this intention (<https://vimeo.com/335290980>) stating

2 *"We are going to take down YouTube and Google and Facebook and Twitter and*
3 *Amazon and Wikipedia and Meetup and then they are all going to pay millions and*
4 *millions and millions of dollars because I am going to personally do my very best to*
5 *inspire with a legal summit ten thousand lawsuits..."* Plaintiff has been doing his best to
6 make good on his promise to waste court resources and tax payer money fighting his own
7 political battles with the civil court system. Biss now represents Congressman Devin
8 Nunes in a series of lawsuits that have been universally derided as baseless attacks on
9 journalism and the first amendment and almost certain to fail on their lack of merits. Biss
10 employs the same overreaching tactics demanding years of tax returns and unnecessary
11 documents via discovery which seem intended to reveal information about opponents to
12 be used against them. (<https://www.fresnobee.com/news/local/article231932983.html>)

15 Defendant maintains the relevance of the Biss / Nunes relationship is a matter of interest
16 in this instant legal action as it serves as another potential piece of evidence of barratry.

17 A defamation case against Twitter for online comments posted by fictional characters (in
18 this case @nunescow and @nunesmom) has virtually no chance of surviving CDA 230
19 and any legitimate lawyer should know this and advise their client. The fact that Nunes is
20 in the unique position to introduce legislation that could modernize CDA 230 makes this
21 a particularly egregious case. Nunes could have been more effective in seeking a remedy
22 with such an approach and is an option a non- congressman would not have.

23
24
25 5. On July 4, 2019 David Seaman published a series of videos indicating that he had been
26 represented by Steven S. Biss in a civil suit. The videos are currently on line in their
27 original format at (<https://dlive.tv/p/dlive-29724283+jJh1VmSZg>) and have been

1 downloaded and preserved by Defendant. **(EXHIBIT A)** In the video, Seaman clearly
2 states "Robert Steele is the one who recommended me to use Biss I had no idea who Biss
3 was and I was going to lunch with Robert Steele shortly after I relocated to DC getting
4 lunch with him where he just emphatically just drilled in drilled in to me that I should get
5 this guy as a lawyer." Seaman has determined that ultimately Biss was not his advocate,
6 but rather sabotaged his case by failing to properly serve his client's needs. Seaman
7 indicates that he believes this was done by Biss to SABOTAGE SEAMAN'S CAREER
8 AS A JOURNALIST. Going after journalists who report unfavorably to his interests has
9 become a pattern and practice for Biss. According to Seaman, Biss abandoned him eight
10 days before his court appearance and instructed Seaman to appear in court Pro Se.
11 Seaman states his belief this was done to expose him to potential sanctions and other
12 confounding matters of legal process as a Pro Se. This also appears to be a standard
13 operating procedure for Biss. Seaman goes on to play an unsolicited voice message from
14 Biss' wife Tanya Cornwell urging him to get in touch with her but warning to remain
15 secretive about her call. Seaman is demanding a refund of his fifteen thousand-dollar
16 (\$15,000) retainer and alleges that Biss, Plaintiff and Cornwell conspired to deceive him.
17 This is substantially the same allegation being made by Defendant and further speaks to
18 the relevance of the facts related to Devin Nunes. It remains Defendant's belief, based on
19 information from a real journalistic source, that the pattern and practice demonstrated by
20 Plaintiff, Biss and their associates, Plaintiff convinced Nunes to seek representation by
21 Biss. The current state of Nunes' suit against Twitter et al, as well as the tremendously
22 negative publicity Nunes has received are consistent with claims made by Seaman, that
23
24
25
26
27
28

1 Biss' actual goal in representing some clients is to sabotage their case and their public
2 reputation while simultaneously bilking them for huge sums of money.

3 6. Defendant does not have any relationship with Seaman and has met him only once at a
4 public event in Washington D.C., on or around March 2017, where they spoke for
5 approximately five minutes. Seaman has come to these conclusions independently.

6 7. On or about June 18, 2019, Manuel Chavez III contacted Defendant and began sharing
7 testimony and email evidence of his relationship and communications with Steven S. Biss
8 and his wife Tanya Cornwell. In these emails, both Cornwell and Biss are persistent in
9 their encouragement of Chavez to sue Goodman based on claims similar to this instant
10 legal action. It is Defendant's belief this violates Virginia State Law Title 18.2. Chapter
11 10. Crimes Against the Administration of Justice » Article 4. Barratry » § 18.2-451.

12 8. Counsel for Plaintiff is in a regular practice of attempting to overwhelm opponents with
13 inappropriate legal action and huge unfounded financial demands for claimed damages.
14 It is Defendant's belief that this is intended to intimidate opponents into submission, very
15 likely through settlement or to otherwise break the financial back of an opponent by
16 forcing them to retain counsel. Defendant has thwarted this by responding pro se and now
17 it seemingly appears the often-censured attorney Biss seeks to confound the Defendant
18 with elements of legal process and by failing to adhere to the most significant rules of
19 procedure, most recently in his improper scheduling of 26f conference. Biss sent a
20 confirmation email to jasongoodman72@protonmail.com. This is NOT an email address
21 provided by Defendant. This is NOT Defendant's email address of record with regard to
22 this or any other matter. This is NOT an email address Defendant has ever
23 communicated with Biss through. This is NOT an email address Defendant has access to.

1 When no response was received to Biss' request for confirmation, no further attempts
2 were made to confirm the scheduled time with Goodman. Biss proceeded in bad faith,
3 knowing Goodman had never specifically said he would be available on the date and time
4 requested, and Goodman was in fact, not available to confer at the inappropriately
5 scheduled time. It is Defendant's belief that this was done purposefully in an attempt to
6 "get ahead" of Defendant with time consuming legal process which might overwhelm
7 and deadlines, resulting in default or some other advantage for Plaintiff.
8

9
10 9. Biss was sanctioned by a three judge panel on November 20, 2008 for his role in a
11 "corporate and securities matter, in which he violated professional rules that govern
12 competence, scope of representation" and engaged in "misconduct that involves
13 **DELIBERATELY WRONGFUL ACTS** [emphasis added] that reflect adversely on his
14 fitness to practice." This stern censure speaks directly to Biss' conduct in this instant
15 lawsuit. Defendant directly questions Biss' fitness to practice law or even abide by it.
16

17 10. During the one year period of suspension resulting from the above referenced matter,
18 Biss again disregarded the law, orders of the court and any semblance of ethics by
19 continuing "to negotiate with an insurance company on behalf of a client in a personal
20 injury matter." For this violation, Biss was sanctioned another 30 days, and the court
21 found this to be "misconduct that reflects adversely on the lawyer's fitness to practice"
22

23 11. On October 18, 2010, the Virginia State Bar Disciplinary Board issued a public
24 reprimand to Biss for violating a professional rule that governs conflict of interest
25 involving a former client. This was an agreed disposition of misconduct charges.

26 12. On July 24, 2017 in a matter brought by the New York State Department of
27 Environmental Conservation, Stephen Scott Biss and his corporation BissCo Holding,
28

1 INC. were found to have committed violations of Articles 17 and 27 of the
2 Environmental Conservation Law of the State of New York and Title 6 of the Official
3 Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR)
4 Parts 360, 372, 374, 612, 613, and 614. A civil penalty of one hundred twenty-two
5 thousand two hundred fifty dollars (\$122,250) was assessed against Biss and BissCo
6 jointly and severally. It remains unclear if Stephen Scott Biss and Steven Scott Biss are
7 one in the same, aliases for an individual or alternately, two different individuals. A
8 "simple google search" for either spelling returns results for both names. More detailed
9 searches with alternate sites focused on background checks or family history display
10 crossover in the results and even list "Stephen Scott Biss" as a "known alias" for Steven
11 Scott Biss. **(EXHIBIT B)** Given the long history of documented and sanctioned frauds
12 perpetrated by Steven Scott Biss, the Defendant was caused to believe the case in 2017 in
13 New York involved him. Biss states this is incorrect. Defendant is unsure of the truth or
14 falsehood of this statement and continues to investigate.

15
16
17
18 13. Defendant made a typographical error in the initial Response to Rule 11 Sanctions (ECF
19 No. 134) accidentally spelling the name of BissCo Holding, Inc CEO Stephen Scott Biss,
20 with a "v" instead of a "ph". The unintentional spelling error is noted and has been
21 corrected in this amended response. The remarkably coincidental similarity in names of
22 the BissCo CEO and counsel for the Plaintiff have led to confusion. The allegedly
23 inaccurate accusation was refuted by council for Plaintiff Biss in section B of Plaintiff's
24 Reply (ECF No. 135) titled "Goodman's Glaring Falsehood".

25
26 14. Defendant did not knowingly include a false statement in the pleading, so referring to it
27 as such is inaccurate. Defendant has several reasons to believe Stephen Scott Biss and
28

1 Steven Scott Biss may be the same individual or Stephen Scott Biss may be a false or
2 manipulated identity created by or otherwise known to Steven Scott Biss.

3 15. Defendants primary reason for presuming the accusation to be true, beyond the virtually
4 identical names, was the pattern and practice of fraudulent behavior demonstrated
5 throughout the career of Steven S. Biss. Biss was admonished by New York Federal
6 Judge William H. Pauley III for his role in a twenty-one-million-dollar escrow fraud.
7 This infraction alone is serious enough that most individuals would have gone to jail for
8 committing such an act. Biss ignored Bar association sanctions and continued to practice
9 law with a suspended license. These actions speak to the integrity, demeanor and general
10 conduct of Biss, both as an unfit to practice attorney and an immoral person. They
11 illustrate an individual who is willing to do whatever he chooses and whatever is
12 necessary to achieve his desired outcome, irrespective of the law, the truth, facts or
13 ethics. He has demonstrated a pattern and practice of deceptive actions characterized by
14 dishonesty throughout his career that according to court rulings, call his fitness to practice
15 law into question. It is Defendant's hope that this honorable court will keep these
16 important facts in mind when considering the false and outrageous claims of Plaintiff and
17 his totally out of control counsel.

18 16. Upon further examination, Defendant has discovered that BissCo Holdings CEO Stephen
19 S. Biss cannot be located. None of four phone numbers listed on line for Stephen S Biss
20 ring through to a subscriber, all are out of service. Neither Stephen S. Biss nor any
21 representative of BissCo Holdings, Inc. responded to any summons or was present for
22 court proceedings in the dispute in New York State. A phone call to the New York DEC
23 on July 2, 2019 revealed that the lead investigator in this matter, Lieutenant Karen
24

1 Staniewsk, has since retired and cannot be contacted. Defendant was instructed by the
2 DEC that any further information could only be obtained through FOIA request. The
3 registered agent for BissCo Holding, Inc is James R. Davies, Esq., at 27 Pearl Street, P.O.
4 Box 2002, Glens Falls, New York, 12801. In a telephone conversation on July 2, 2019
5 Davies confirmed that he was in fact the lawyer for BissCo Holding and had previously
6 communicated with Stephen S Biss. He described him as "medium height, medium
7 build" and "balding". While not conclusive, these descriptors might be used to identify
8 counsel for Plaintiff. Remarkably, Davies volunteered without being prompted that he
9 recalled some confusion related to the dual spelling of his former client's name. Davies
10 also stated that he had not communicated with Biss for ten or more years. Davies had
11 attempted to contact his former client in 2017 when the DEC sent summonses. Davies
12 made a specific point, and reiterated it, that he went out of his way to locate Biss in 2017
13 and found it "unusual" that he was unable to reach him. It would seem the only litigant
14 more difficult to locate than Susan Lutzke Holmes is Stephen Scott Biss. Defendant was
15 caused to believe that this use of false identities, confusing identities or possibly
16 manipulated identities could be a method of avoiding civil or other legal matters and
17 there was sufficient evidence to presume the actions carried out by Stephen Scott Biss
18 might be those of Steven Scott Biss. Defendant reiterates the allegation that Plaintiff via
19 his counsel and / or others has conspired with Tut/Lutzke/Holmes to frustrate the
20 Defense. The co-Defendant in question has behaved in substantially the same manner as
21 Stephen Scott Biss, making numerous false statements, ignoring service and failing to
22 appear. While this could be coincidental, Defendant understood this behavior to be an
23 additional element of evidence linking the modus operandi in the two disparate matters.
24
25
26
27
28

1 17. Throughout the course of Plaintiff's solicitation of \$250,000 (two hundred fifty thousand
2 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, and even to
3 this very day, Plaintiff claims to have written the NATO Open Source Intelligence
4 Handbook despite adamant, credible claims to the contrary. The retired Four-Star U.S.
5 Army General who was in charge of the NATO Southern Atlantic Command at the time
6 of the book's publication has declared Plaintiff's claim "ridiculous" and false. In a
7 telephone interview published on May 1, 2019, Kernan states with no equivocation,
8 Plaintiff's claim of authorship is ridiculous. **(EXHIBIT C)** Defendant has no reason to
9 doubt the General's testimony and many to doubt Plaintiff's. Defendant remains
10 confident in his statement that Plaintiff's claims of writing the Open Source Intelligence
11 Handbook are false, or at least materially misleading. Using such a false claim to entice
12 the public to donate to a 501(c)(3) tax exempt corporation is of course charity fraud.
13

14
15 18. Throughout the course of his solicitation of \$250,000 (two hundred fifty thousand
16 dollars) in charitable contributions to his 501(c)(3) tax exempt corporation, Plaintiff
17 claimed to have been "nominated" for a Nobel Peace Prize. The only supportive
18 evidence to substantiate this claim is a PDF document authored by Plaintiff himself,
19 posted to his own web site ([https://robertdavidsteele.com/wp-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)
20 [content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)
21 [David-Steele.pdf](https://robertdavidsteele.com/wp-content/uploads/2015/12/NOMINATION-FOR-THE-NOBEL-PEACE-PRIZE-Robert-David-Steele.pdf)). Plaintiff has even suggested during this legal proceeding that
22 Defendant should have KNOWN Defendant's own statements to be false, because
23 according to Plaintiff the true facts are contained in this document on Plaintiff's website.
24 Even a cursory examination of the document's properties **(EXHIBIT D)** reveals the
25 "nomination" was in fact written by Plaintiff himself using a nine-year-old version of
26
27
28

1 Microsoft Word and an equally antiquated revision of Adobe Acrobat. Since the start of
2 this legal action, and Defendant's vehement public proclamations of Plaintiff's extensive
3 fraud, Plaintiff has taken to revising his language on this particular talking point,
4 referring to it as a "recommendation" for the Nobel prize nomination rather than an actual
5 nomination. This change was made AFTER nearly \$10,000 was contributed to Plaintiff's
6 501(c)(3) by members of Defendant's viewing audience and after doubts with regard to
7 the veracity of the initial claim were raised in regard to this lawsuit. It is Defendant's
8 belief that Plaintiff has made this revision because Plaintiff is fully aware that falsifying
9 his credentials or falsely embellishing his resumé to entice charitable donations IS
10 CHARITY FRAUD. No actual evidence of a Nobel Peace Prize nomination has been
11 shown and none exists to the best of Defendant's knowledge. Defendant stands by his
12 statements that Plaintiff is both an idiot and a fraud.
13

14
15 19. During a YouTube broadcast that has since been removed from the internet, Plaintiff has
16 publicly declared that discovery in this instant legal action has informed him that
17 Defendant is paid by Israeli Mossad, this is categorically false. The improperly
18 scheduled 26f conference did not take place until May 2019, and no documentation has
19 been produced as yet. Plaintiff's comments were made months prior to May 2019 and
20 Defendant has never received any funding or any payments whatsoever from Israeli
21 Mossad or any related entities to the best of Defendant's knowledge. This is one of the
22 key themes propagated by various members of the conspiracy to defame Defendant.
23

24
25 20. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor
26 Application D. George Sweigert, telephone Manuel Chavez III, making substantially the
27 same claim, falsely stating that Defendant Goodman was paid by Black Cube
28

1 (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former
2 Mossad agents and operatives, according to their own public website.

3 21. On or around June 2019, Manuel Chavez III voluntarily shared some of his personal
4 emails with Defendant. Among these were messages Chavez claims are communications
5 from Thomas Shoenberger, an individual unknown to Defendant who may in fact be
6 highly placed in the organization of the monetized conspiracy to harass and defame
7 Defendant Goodman. The emails from Shoenberger provide talking points for a plan to
8 attack Defendant Goodman's reputation with false allegations claiming Goodman is an
9 agent of Israel and / or paid by Mossad.
10

11 22. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas
12 Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.

13 **(EXHIBIT E)** This email provides evidence that counsel for Plaintiff Biss is using his
14 wife as a "cutout" or conduit through which he can indirectly communicate with the co-
15 conspirators and still provide the plausible claim that "I haven't spoken with (fill in the
16 name)". This email provides substantial evidence of the conspiracy alleged by
17 Defendant. A transcript of a publicly broadcast multiparty phone conversation between
18 Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence
19 previously in this matter (ECF No. 78 EXHIBIT A).
20

21 23. Chavez provided an email between Plaintiff and Chavez in which Plaintiff admits he is in
22 direct contact with alleged co-conspirator Tyroan Simpson, **(EXHIBIT F)** and seeks
23 approval from Biss' wife Tanya for communicating with Simpson against Biss'
24 instructions. It would seem Biss had advised Steele not to communicate with Simpson in
25 an effort to hide their collaboration and provide further evidence of conspiracy.
26

1 24. In the rule 11 motion, Plaintiff has expressed incredulity at the fact that the mere filing of
2 this legal action, in absence of a judgment, has not stopped Goodman from producing
3 broadcasts that address Plaintiff's abuse of the legal system, Plaintiff's multiple frauds on
4 the public and Plaintiff's ongoing efforts to harass and intimidate Goodman, Goodman's
5 talk show guests and audience. Goodman continues to report and comment on the
6 activities of Plaintiff and his associates as they are matters of public interest.

7
8 25. Plaintiff's motion for rule 11 sanctions against Goodman has no basis in fact or law and
9 is yet another in a long series of intimidation tactics intended to distract Defendant from
10 investigative journalism, derail Defendant's reporting on alleged wrongdoing by Plaintiff
11 and otherwise result in gaining some advantage over Defendant with regard to this legal
12 action.

13
14 26. Goodman made statements regarding Biss' association with Congressman Devin Nunes
15 based on information and belief that those statements were true and correct. Goodman
16 remains consistent in that belief. A journalistic source close to Nunes told Goodman
17 directly that Biss was recommended to Nunes by Steele. Shortly after filing the suit
18 against Twitter, Nunes made an appearance on Fox News
19 (https://www.youtube.com/watch?v=U1_c860YIPc) in which he repeated Plaintiff's
20 talking points as articulated in the above referenced David Seaman interview, claiming
21 multiple lawsuits would be filed against Twitter, Google and others. Goodman's claim
22 was made in good faith, and Goodman believes to this day that Plaintiff either directly or
23 indirectly recommended Biss to Nunes or otherwise played some role in connecting the
24 two parties and / or has influence over Nunes' suit via interaction with Biss. Intervenor
25 Applicant has made numerous public calls in now deleted YouTube broadcasts for
26
27
28

1 Congress to open an investigation into the incidents at the Port of Charleston on June 14,
2 2017, despite the FBI's completion of a full investigation. Intervenor Applicant has also
3 publicly proclaimed Devin Nunes will now be somehow compelled to act in response to
4 this instant legal matter. Furthermore, the Nunes/Biss Twitter lawsuit has been
5 universally derided by legal experts on both sides of the political fence for numerous
6 shortcomings, improprieties and obvious legal missteps. Both Twitter and the one non-
7 fictional co-defendant have pointed out that filing in VA state court represents possible
8 venue shopping and / or publicity efforts but is not the appropriate venue given Nunes
9 California residency, Twitter's primary business location and a stipulation in the Twitter
10 EULA that all civil matters are to be adjudicated in California. These substantial
11 deficiencies aside, legal experts consider the action virtually guaranteed to fail given
12 Twitter and all social media networks are currently protected by CDA 230 and suits of
13 this nature have not succeeded since the Digital Millennium Copyright Act came into
14 being in the late 1990s. Any legitimate lawyer with an honest claim should be aware of
15 this, as should any competent member of Congress. A more sensible approach would be
16 to advise a sitting Congressman to introduce legislation to address shortcomings in the
17 arguably obsolete statute as Senator Josh Hawley has done, just this past week.

18
19
20
21 ([https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-](https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies)
22 [230-immunity-big-tech-companies](https://www.hawley.senate.gov/senator-hawley-introduces-legislation-amend-section-230-immunity-big-tech-companies)) Based on these facts it is Defendant's belief that

23 Counsel for Plaintiff has an ulterior motive in representing Mr. Nunes, possibly as simple
24 and bilking the a potentially gullible representative for money and / or publicity. It
25 should also be noted that the Nunes/Biss suit against Twitter contains allegations against
26 journalists who have authored unfavorable news items about representative Nunes and
27

1 has already been amended to eliminate the false claim that specific words in a journalist's
2 tweet where highlighted in bold type. In a recent Fox News interview,
3 ([https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-](https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml)
4 [bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml](https://www.techdirt.com/articles/20190411/15061441985/devin-nunes-admits-that-his-bogus-defamation-lawsuits-are-really-about-phishing-journalists-sources.shtml)) Mr.
5 Nunes states "I am absolutely sure that they do not want this to get to discovery so that
6 we find out who their sources are." This statement echoes the underhanded tactics
7 practiced by Plaintiff and his "unfit to practice" attorney. They have demonstrated a
8 pattern and practice of threatening adversaries with discovery and then seeking
9 outrageous overreaching document production in that process. They wield civil legal
10 measures like a weapon and have frequently spoken about using it to get personal,
11 sensitive or otherwise protected information from individuals who they perceive as
12 adversaries. Plaintiff and his attorney falsely believe they can use the discovery process
13 in a fraudulent civil legal matter to pierce the armor of the U.S. Constitution and
14 protection of journalistic sources and the American public's right to a free press and
15 freedom of speech.
16
17
18

19 27. Plaintiff's counsel Steven S. Biss is in the regular practice of flouting the law and
20 encouraging frivolous and vexatious punitive legal action against unfavorable journalists
21 in direct conflict with the first amendment right to free speech. This tactic was used
22 against Jake Morphonios, as revealed by Morphonios' name appearing in the original
23 complaint filed in this matter. (ECF No. 1 page 32 paragraph 26). This error reveals Biss'
24 cut and paste approach to bringing vexatious and frivolous suits against journalists or
25 those seeking to do legitimate investigation into the activities of the clients he represents.
26
27
28

1 28. Another email provided by Manuel Chavez III reveals not only that Biss' wife Tanya
2 Cornwell, was actively encouraging Chavez to bring suit against Goodman (in lieu of
3 Steele doing so) she is in fact the actual author of the Morphonios lawsuit, and therefore,
4 conceivably at least partly due credit for authoring the original complaint in this instant
5 legal action. **(EXHIBIT G)** In this email Cornwell goes as far as stating "I'm guessing a
6 half a million bucks they will throw at you to just make it go away" clearly stating the
7 intention and expectations of Plaintiff's legal team at the outset of this matter.
8

9 29. In a video posted to YouTube on June 23, 2019, Manuel Chavez III revealed that a user
10 with the handle AMABISS had provided him with payments totaling one thousand five
11 hundred dollars (\$1,500) via Patreon on August 1, 2017 at the exact time frame the
12 events detailed in this legal matter where taking place. **(EXHIBIT H)** Chavez has
13 confirmed that username AMABISS is Tanya Cornwell, wife of counsel for Plaintiff
14 Steven S. Biss.
15

16 30. Plaintiff Steele has directly and publicly interacted with George Webb Sweigert, brother
17 of Intervenor Applicant both on video
18 (<https://www.youtube.com/watch?v=hMJ0AO5OZY8>) and via email as presented in ECF
19 No. 78 Exhibit O)
20

21 31. Plaintiff Steele has directly and publicly interacted with Manuel Chavez III on several
22 occasion including on videos still viewable on YouTube
23 (https://www.youtube.com/watch?v=_Xtz_S0tH1g). Plaintiff has also privately
24 communicated with Chavez in a clandestine manner via email as revealed by Manuel
25 Chavez earlier this week.
26
27
28

1 32. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant
2 and has received direct instructions from Intervenor Applicant. Intervenor Applicant
3 operates a YouTube channel under the account name "Prepper Kitty Intel PKI". Many
4 exhibits in this instant legal matter have referenced this YouTube account. YouTube
5 username Prepper Kitty Intel has paid Chavez via YouTube Superchat (**EXHIBIT I**)

6
7 33. Intervenor Applicant has directly and publicly interacted with George Webb Sweigert,
8 Manuel Chavez III, and Tyroan Simpson, evidence of these communications has been
9 provided previously in these pleadings.

10 34. According to pleadings and public statements by Intervenor Applicant he has interacted
11 with Susan Lutzke/Holmes privately in revealing the identity of O. Marshall Richards
12 and other matters.

13
14 35. According to statements by Susan Lutzke/Holmes she has interacted with Intervenor
15 Applicant privately in revealing the identity of O. Marshall Richards and other matters.
16 (<https://www.youtube.com/watch?v=WwyRPFhW-HE>)

17
18 36. Counsel for Plaintiff is in a regular practice of ignoring the law, lying to courts, clients,
19 legal adversaries and the public. In 2009, Counsel for Plaintiff had his legal license
20 suspended by the VA State Bar Association for one year. Despite this severe measure,
21 Biss continued to practice law in direct defiance of the order, earning an extended
22 suspension for the transgression. Despite this, Biss continued his unscrupulous and
23 unlawful activity. On July 24, 2017, it was determined that both Counsel for Plaintiff and
24 a corporation owned by Counsel, Bissco Holdings, Inc ("Bissco") had violated New York
25 State Environmental Conservation regulations. Multiple counts detailed Counsel's
26 improper disposal of hazardous toxic waste and demonstrated Counsel for Plaintiff's total
27

1 disregard for the law, the environment and the health and safety of the general public.

2 (<https://www.dec.ny.gov/hearings/110879.html>). The New York State Department of
3 Environmental Conservation was awarded default judgements against Steven S. Biss and
4 Bissco In the Matter of the Alleged Violations of Articles 17 and 27 of the Environmental
5 Conservation Law of the State of New York and Title 6 of the Official Compilation of
6 Codes, Rules and Regulations of the State of New York (6 NYCRR) Parts 360, 372, 374,
7 612, 613, and 614. Biss was ordered to pay a civil penalty in the amount of one hundred
8 twenty-two thousand two hundred fifty dollars (\$122,250). (DEC Case No. R5-
9 20120627-2006)
10

11
12 37. Defendant Goodman has never been sanctioned, arrested, accused or charged of any
13 crimes or legal wrongdoing, prior to the allegations of Plaintiff.

14 38. In Plaintiff's Motion for rule 11 sanctions, Plaintiff claims to have never had any
15 communication with Intervenor Applicant, but then immediately contradicts this claim,
16 stating he has received email communications from Intervenor Applicant. The motion
17 goes on to describe counsel for Plaintiff responding to Intervenor Applicant making this
18 denial of communication and semantic maze to be navigated by anyone trying to
19 determine if there has or has not been communication between parties and / or
20 representatives or intermediaries. To clarify Defendant's claim, while it is clear the
21 alleged co-conspirators have gone out of their way to avoid direct communicaitons
22 between certain parties, there are common connections that allow indirect
23 communications which facilitate the alleged conspiracy and circumvent the capabilities
24 of civil legal matters.
25
26
27
28

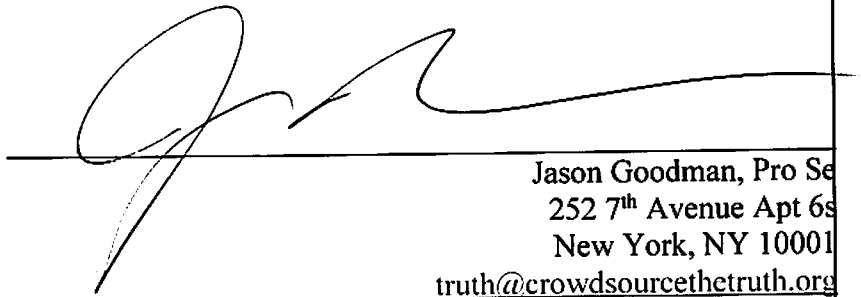
1 39. On July 7, 2017 Plaintiff sent an email communication to George Webb Sweigert, brother
2 of Intervenor Applicant, stating "A massive law suit is about to be filed against Jason
3 Goodman by a lawyer who specializes in defamation cases. Manny is the one who will
4 be in front" (**EXHIBIT J**) Manny is Manuel Chavez III, one of the individuals who was
5 on the multiparty video chat in which Sweigert agreed to a monetized harassment effort
6 targeting Defendant as presented here in previous pleadings. This email was sent just
7 three weeks after Tanya Cornwell sent the above referenced email to Manuel Chavez III
8 encouraging him to sue Defendant Goodman. It is conceivable that Plaintiff intended to
9 use Chavez as a "cut out" to bring the same type of legal action against Defendant
10 Goodman, subjecting Goodman the the same legal jeopardy and assumed need to hire
11 counsel and subsequent financial ruin, without subjecting himself to the risk of fines for
12 legal fees or other sanctions. It now seems Chavez' sense of self-preservation prevented
13 him from complying with this plan and may have led to the break in the relationship, and
14 dissention in the ranks of the conspirators.
15
16
17

18 **EGREGIOUS MISCONDUCT BY COUNSEL FOR PLAINTIFF**

19 Thorough examination of the behavior of counsel for Plaintiff is necessary in this matter.
20 Defendant has presented copious evidence that counsel Steven S. Biss, in addition to his long list
21 of career spanning transgressions resulting in numerous sanctions and suspension of his law
22 license, is in fact a co-conspirator with Plaintiff and others in this instant action and is guilty of
23 barratry. Biss worked in coordination with his wife Tanya Cornwell, Plaintiff, Manuel Chavez
24 III and others, engaging in inappropriate behavior leading up to and continuing through the
25 initiation of this law suit. It is Defendant's belief that counsel for Plaintiff knowingly engaged in
26 barratry and even utilized his wife to do so in a likely attempt to avoid implication in these acts.
27
28

CONCLUSION

To the best of his knowledge, Defendant has made NO known false statements and has not intentionally misrepresented any facts. Defendant has not presented any known false information or entered any motions or pleadings for improper purpose, nor to harass, cause unnecessary delay, nor needlessly increase the cost of litigation. The exact opposite is in fact the truth. Plaintiff has done each of these things while Defendant has sought to end this matter as quickly and with as little disruption and wasted resources as possible. Plaintiff and his counsel are in the regular practice of instigating lawsuits based on false claims or for bad faith purposes as demonstrated by the public statements of David Seaman. For the above stated reasons, Plaintiff's motion for rule 11 sanctions should be denied, and Defendant Goodman humbly requests that the court consider sanctions against Plaintiff and Counsel Biss as well as a criminal referral to investigate allegations of conspiracy to commit barratry by Plaintiff Robert David Steele, counsel for Plaintiff Steven Scott Biss and Tanya Cornwell. The evidence presented in this pleading speaks for the facts of this matter.



Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
truth@crowdsourcethetruth.org

EXHIBIT A

Transcript of David Seaman Fulcrum News Public Statements on D.Live July 4, 2019

1

00:00:02,120 --> 00:00:08,460
but I just searched for his name on

2

00:00:05,180 --> 00:00:12,269
search for his name on Justia through

3

00:00:08,460 --> 00:00:14,910
the federal court records and you know

4

00:00:12,269 --> 00:00:16,379
it's right there it's not like nobody

5

00:00:14,910 --> 00:00:18,990
sent this to me I didn't pull it out of

6

00:00:16,379 --> 00:00:21,990
a hat it's literally here's his name

7

00:00:18,990 --> 00:00:25,010
Steven Scott this here's his fucking

8

00:00:21,990 --> 00:00:29,939
name and is practicing in Arkansas in

9

00:00:25,010 --> 00:00:32,399
1998 and 1999 unless he has identical

10

00:00:29,939 --> 00:00:34,590
twin practices under the same exact name

11

00:00:32,399 --> 00:00:36,719

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 21

1 and the same state as him at that time

2 12

3 00:00:34,590 --> 00:00:40,110

4 it appears that he was on the defense

5 13

6 00:00:36,719 --> 00:00:44,129

7 team it appears he was on the defense

8 14

9 00:00:40,110 --> 00:00:47,280

10 team very much so very much so for Bill

11 15

12 00:00:44,129 --> 00:00:49,649

13 Clinton who he was former chief of staff

14 16

15 00:00:47,280 --> 00:00:51,840

16 in the White House was John Podesta and

17 17

18 00:00:49,649 --> 00:00:54,600

19 of course Podesta was also hired by

20 18

21 00:00:51,840 --> 00:00:57,989

22 Hillary to run her campaign so to not

23 19

24 00:00:54,600 --> 00:00:59,879

25 mention to me that his former client was

26 20

27 00:00:57,989 --> 00:01:01,890

28 one of the one of the people that in a

29 21

30 00:00:59,879 --> 00:01:04,680

31 heartbeat I would have said oh no I

32 22

33 00:01:01,890 --> 00:01:07,380

34 can't use you this a lawyer can't use

1 23

00:01:04,680 --> 00:01:07,650

2 you as a lawyer if if this is who you

3 24

4 00:01:07,380 --> 00:01:09,780

5 are

6 25

00:01:07,650 --> 00:01:13,409

7 right how can I trust your judgment your

8 26

9 00:01:09,780 --> 00:01:15,780

10 materially compromised so this obviously

11 27

00:01:13,409 --> 00:01:18,299

12 has set me back a little bit it makes me

13 28

00:01:15,780 --> 00:01:19,710

14 believe less in the swamp I don't think

15 29

16 00:01:18,299 --> 00:01:22,049

17 the swamp has been drained

18 30

00:01:19,710 --> 00:01:24,840

19 I think Podesta still being free and

20 31

21 00:01:22,049 --> 00:01:26,729

22 Hillary's still being free and the fact

23 32

00:01:24,840 --> 00:01:29,130

24 this man's other client Timothy home

25 33

00:01:26,729 --> 00:01:31,380

26 said he won't talk about his other

27 34

28 00:01:29,130 --> 00:01:35,070

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 23

1 client Timothy home Seth where is Tim

2 35

3 00:01:31,380 --> 00:01:37,229

4 ohmsett air is Tim home set uh so this

5 36

6 00:01:35,070 --> 00:01:40,229

7 isn't right folks this Lanny Davis

8 37

9 00:01:37,229 --> 00:01:42,509

10 Cepeda gate he just came in and took

11 38

12 00:01:40,229 --> 00:01:44,460

13 fifteen thousand dollars my money and

14 39

15 00:01:42,509 --> 00:01:45,899

16 what I wanted when I wanted to fire

17 40

18 00:01:44,460 --> 00:01:48,810

19 months ago

20 41

21 00:01:45,899 --> 00:01:51,180

22 disgusting Robert David Steele former

23 42

24 00:01:48,810 --> 00:01:52,740

25 CIA man Robert David Steele is the one

26 43

27 00:01:51,180 --> 00:01:54,960

28 who convinced me to maintain my

44

00:01:52,740 --> 00:01:57,540

confidence even though I had none and

45

00:01:54,960 --> 00:02:00,270

then it was voicemails from Steve mrs.

1 46

00:01:57,540 --> 00:02:02,969

2 wife I'll play you guys one of them was

3 47

4 00:02:00,270 --> 00:02:06,030

5 actually voicemails and unsolicited text

6 48

7 00:02:02,969 --> 00:02:07,890

8 messages from Steve Biss' wife that

9 49

10 00:02:06,030 --> 00:02:09,929

11 convinced me to have faith in that piece

12 50

13 00:02:07,890 --> 00:02:12,619

14 of shit for much longer than I should

15 51

16 00:02:09,929 --> 00:02:12,619

17 have

18 52

19 00:02:14,690 --> 00:02:20,670

20 it really I threw up a little bit

21 53

22 00:02:19,320 --> 00:02:22,980

23 earlier because it's the done meet here

24 54

25 00:02:20,670 --> 00:02:25,500

26 in DC over the last year it's not right

27 55

28 00:02:22,980 --> 00:02:27,780

they have in mind for me some variation

56

00:02:25,500 --> 00:02:29,790

of what they did to Tim home set right

57

00:02:27,780 --> 00:02:32,190

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 25

1 not acceptable with Stephen Scott this

2 58

3 00:02:29,790 --> 00:02:34,740

4 and what Robert David Steele are doing

5 59

6 00:02:32,190 --> 00:02:37,320

7 to truthers who call out criminals close

8 60

9 00:02:34,740 --> 00:02:39,990

10 to the Clinton family is simply no

11 61

12 00:02:37,320 --> 00:02:41,700

13 longer acceptable not acceptable at all

14 62

15 00:02:39,990 --> 00:02:44,760

16 and I've informed one federal agency

17 63

18 00:02:41,700 --> 00:02:46,830

19 about what Stephen what Stephen visited

20 64

21 00:02:44,760 --> 00:02:49,140

22 and I'm going to inform many many more

23 65

24 00:02:46,830 --> 00:02:51,540

25 have a lot of friends here in DC believe

26 66

27 00:02:49,140 --> 00:02:53,480

28 it or not Stephen Scott BIST he couldn't

67

00:02:51,540 --> 00:02:56,040

even remember if I still lived in DC

68

00:02:53,480 --> 00:02:57,810

that's what a bad lawyer the scope so I

1 69

00:02:56,040 --> 00:02:59,310

2 don't know you're still living in DC how

3 70

4 00:02:57,810 --> 00:03:01,740

5 do you not know where I live when you're

6 71

00:02:59,310 --> 00:03:03,360

7 filing cases for me how do you not know

8 72

9 00:03:01,740 --> 00:03:05,490

10 my jurisdiction to where I live I don't

11 73

00:03:03,360 --> 00:03:07,740

12 know you were still in DC okay then

13 74

14 00:03:05,490 --> 00:03:10,590

15 you're not paying enough attention this

16 75

00:03:07,740 --> 00:03:12,540

17 guys filed so many cases right just a

18 76

00:03:10,590 --> 00:03:15,270

19 greedy swamp creature

20 77

21 00:03:12,540 --> 00:03:17,519

22 greedy swamp creature but again to not

23 78

00:03:15,270 --> 00:03:19,709

24 disclose to me that he has worked for

25 79

00:03:17,519 --> 00:03:21,630

26 the Clintons and then the text me

27 80

28 00:03:19,709 --> 00:03:23,430

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 27

1 protects me and to try to Gaslight away

2 81

3 00:03:21,630 --> 00:03:26,280
4 from this this is very real just eeh

5 82

6 00:03:23,430 --> 00:03:28,760
very real just II a document right here

7 83

8 00:03:26,280 --> 00:03:32,280
you know you can search for it yourself

9 84

10 00:03:28,760 --> 00:03:34,470
11 to try to Gaslight me and to say to me

12 85

13 00:03:32,280 --> 00:03:37,200
let's read the text he texted me back 10

14 86

15 00:03:34,470 --> 00:03:38,010
16 minutes later I texted him today at 3:40

17 87

18 00:03:37,200 --> 00:03:39,930
1 p.m.

19 88

20 00:03:38,010 --> 00:03:41,850
don't you think representing the

21 89

22 00:03:39,930 --> 00:03:44,040
23 Clintons in the past puts you at a

24 90

25 00:03:41,850 --> 00:03:48,660
material disadvantage in terms of being

26 91

27 00:03:44,040 --> 00:03:50,940
objective with my case the Clintons are

28

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 28

1 92

00:03:48,660 --> 00:03:53,130

2 pedophiles and the employers of the man

3 93

4 00:03:50,940 --> 00:03:55,530

5 I added John Podesta you should have

6 94

00:03:53,130 --> 00:03:58,470

7 disclosed that and so much more he

8 95

9 00:03:55,530 --> 00:03:58,980

10 responds ten minutes later happy fourth

11 96

00:03:58,470 --> 00:04:01,799

12 of July

13 97

00:03:58,980 --> 00:04:03,780

14 you have been fed more bad Intel I have

15 98

16 00:04:01,799 --> 00:04:05,640

17 never represented the Clintons he puts

18 99

00:04:03,780 --> 00:04:07,590

19 Clinton's in quotes for some reason not

20 100

00:04:05,640 --> 00:04:09,420

21 sure why I've never represented the

22 101

00:04:07,590 --> 00:04:11,090

23 Clinton sir either of them or any member

24 102

00:04:09,420 --> 00:04:13,739

25 of their family have a good day okay

26 103

00:04:11,090 --> 00:04:16,290

27

28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 29

1 well I wasn't fed any Intel I literally

2 104

3 00:04:13,739 --> 00:04:17,040

4 just searched for your full name on

5 105

6 00:04:16,290 --> 00:04:19,739

7 Justia

8 106

9 00:04:17,040 --> 00:04:21,989

10 and it appears to match appears to match

11 107

12 00:04:19,739 --> 00:04:24,120

13 where you were practicing at that

14 108

15 00:04:21,989 --> 00:04:25,000

16 particular moment and time and space

17 109

18 00:04:24,120 --> 00:04:26,530

19 appear

20 110

21 00:04:25,000 --> 00:04:28,450

22 to match that and unless we're it's some

23 111

24 00:04:26,530 --> 00:04:30,760

25 kind of weird it's some kind of weird

26 112

27 00:04:28,450 --> 00:04:32,980

28 multiverse which is really beyond the

113

00:04:30,760 --> 00:04:34,900

scope of this conversation unless that's

114

00:04:32,980 --> 00:04:40,980

the case it seems like this is where you

1 115

00:04:34,900 --> 00:04:43,870

2 were in 1998 it seems very much so so

3 116

4 00:04:40,980 --> 00:04:49,150

5 you know this is this is highly

6 117

00:04:43,870 --> 00:04:50,860

7 problematic and then I I texted them a

8 118

9 00:04:49,150 --> 00:04:52,810

10 couple of more questions in no response

11 119

00:04:50,860 --> 00:04:54,910

12 so we know he got them because he

13 120

00:04:52,810 --> 00:04:56,830

14 responded to the first question no

15 121

16 00:04:54,910 --> 00:04:58,870

17 response to anything else I texted him

18 122

00:04:56,830 --> 00:05:01,870

19 right I said looking at a Justia

20 123

21 00:04:58,870 --> 00:05:05,380

22 document that says he did I is just eeheh

23 124

00:05:01,870 --> 00:05:07,690

24 fake news are you a pedophile what

25 125

00:05:05,380 --> 00:05:10,510

26 happened to Tim home Seth do you have a

27 126

28 00:05:07,690 --> 00:05:13,630

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 31

1 kickback relationship of any kind with

2 127

3 00:05:10,510 --> 00:05:16,330

4 former CIA analyst Robert Steele did you

5 128

6 00:05:13,630 --> 00:05:18,669

7 know you had not even one legal

8 129

9 00:05:16,330 --> 00:05:22,210

10 representative in New York did you know

11 130

12 00:05:18,669 --> 00:05:25,840

13 having me go before an Obama judge pro

14 131

15 00:05:22,210 --> 00:05:27,700

16 se meaning representing myself given the

17 132

18 00:05:25,840 --> 00:05:30,280

19 wording of your lawsuit could have

20 133

21 00:05:27,700 --> 00:05:32,830

22 exposed me to great harm why do you and

23 134

24 00:05:30,280 --> 00:05:36,460

25 your wife target pedo gate journalists

26 135

27 00:05:32,830 --> 00:05:39,760

28 for destruction did you do \$15,000 of

136

00:05:36,460 --> 00:05:45,570

work for me so here's a voicemail from

137

00:05:39,760 --> 00:05:45,570

his wife January 16 of this year

1 138

00:06:33,240 --> 00:06:37,840

2 right she sounds nervous cuz the reason

3 139

4 00:06:36,310 --> 00:06:38,830

5 why she called me that particular moment

6 140

00:06:37,840 --> 00:06:41,409

7 is I

8 141

9 00:06:38,830 --> 00:06:43,240

10 and it told him I'm not happy with the

11 142

00:06:41,409 --> 00:06:45,009

12 representation and some friends of mine

13 143

00:06:43,240 --> 00:06:46,509

14 who are in the legal profession have

15 144

16 00:06:45,009 --> 00:06:48,819

17 told me that the way you're representing

18 145

00:06:46,509 --> 00:06:50,949

19 me is simply not good you're not giving

20 146

21 00:06:48,819 --> 00:06:53,020

22 me enough time you're not answering very

23 147

00:06:50,949 --> 00:06:54,490

24 basic questions that I have and you're

25 148

00:06:53,020 --> 00:06:56,349

26 not making yourself available in a

27 149

28 00:06:54,490 --> 00:06:57,970

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 33

1 timely fashion and you're making me

2 150

3 00:06:56,349 --> 00:06:59,229
uncomfortable you're making me

4 151

5 00:06:57,970 --> 00:07:01,840
6 uncomfortable with answers that don't

7 152

8 00:06:59,229 --> 00:07:03,340
satisfy me and if answers that

9 153

10 00:07:01,840 --> 00:07:07,180
11 contradict what you've said to me in the

12 154

13 00:07:03,340 --> 00:07:12,129
recent past and so she reached out to me

14 155

15 00:07:07,180 --> 00:07:13,990
unsolicited with that phone call isn't

16 156

17 00:07:12,129 --> 00:07:15,819
18 that weird like why this is secretary

19 157

20 00:07:13,990 --> 00:07:17,349
trying to be all sneaky with me am I

21 158

22 00:07:15,819 --> 00:07:17,979
23 supposed to play this little game with

24 159

25 00:07:17,349 --> 00:07:21,069
these people

26 160

27 00:07:17,979 --> 00:07:23,199
I paid \$15,000 I don't want his wife

28

1 161

00:07:21,069 --> 00:07:24,909

2 calling me oh we respect you so much

3 162

4 00:07:23,199 --> 00:07:28,690

5 this something off about this whole

6 163

00:07:24,909 --> 00:07:31,199

7 experience and what happened to Tim what

8 164

9 00:07:28,690 --> 00:07:31,199

10 happened

11 165

00:07:54,650 --> 00:07:57,720

12 [Music]

13 166

14 00:08:18,330 --> 00:08:25,199

15 yeah what happened to me and Robert

16 167

00:08:21,759 --> 00:08:28,050

17 David Steele is perhaps the most weird

18 168

00:08:25,199 --> 00:08:31,000

19 the most weird part of this whole a

20 169

21 00:08:28,050 --> 00:08:34,690

22 whole episode right so Robert Steele is

23 170

00:08:31,000 --> 00:08:36,430

24 the one who recommended me to use Biss I

25 171

00:08:34,690 --> 00:08:37,870

26 had no idea who Biss was and it was

27 172

28 00:08:36,430 --> 00:08:41,620

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 35

1 going to lunch with Robert Steele

2 173

3 00:08:37,870 --> 00:08:42,669

4 shortly after I relocated to DC getting

5 174

6 00:08:41,620 --> 00:08:45,610

7 lunch with him where he just

8 175

9 00:08:42,669 --> 00:08:47,140

10 emphatically just drilled in drilled

11 176

12 00:08:45,610 --> 00:08:50,170

13 into me that I should get this guy as a

14 177

15 00:08:47,140 --> 00:08:57,279

16 lawyer I did go after it was done to me

17 178

18 00:08:50,170 --> 00:09:00,910

19 and everybody so I just wanna say hi but

20 179

21 00:08:57,279 --> 00:09:02,709

22 I want to show some stuff on screen so

23 180

24 00:09:00,910 --> 00:09:05,440

25 here's what I texted Robert Steele

26 181

27 00:09:02,709 --> 00:09:10,870

28 here's what I texted him on Sunday June

182

00:09:05,440 --> 00:09:13,300

16th at 10:57 a.m. began June 16th of

183

00:09:10,870 --> 00:09:15,940

this year this is what I texted him

1 184

00:09:13,300 --> 00:09:18,790

2 after talking to him talking to him on

3 185

4 00:09:15,940 --> 00:09:19,180

5 the phone in which he started yelling at

6 186

7 00:09:18,790 --> 00:09:21,370

8 me

9 187

00:09:19,180 --> 00:09:24,070

10 it started yelling at me after he said

11 188

00:09:21,370 --> 00:09:26,529

12 he told me that he and Stephen Biss and

13 189

00:09:24,070 --> 00:09:28,660

14 this is almost an exact quote right even

15 190

16 00:09:26,529 --> 00:09:31,990

17 the curse word even the curse word he

18 191

00:09:28,660 --> 00:09:33,550

19 used as my memory serves but I don't

20 192

21 00:09:31,990 --> 00:09:36,220

22 remember the exact quotes this is just

23 193

00:09:33,550 --> 00:09:39,399

24 my best reconstruction of it he said

25 194

00:09:36,220 --> 00:09:42,070

26 that he and this had told home set to

27 195

28 00:09:39,399 --> 00:09:42,579

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 37

1 keep his fucking mouth shut until the

2 196

3 00:09:42,070 --> 00:09:44,440

4 trial

5 197

6 00:09:42,579 --> 00:09:47,889

7 he said Tim home Seth is his own worst

8 198

9 00:09:44,440 --> 00:09:49,540

10 enemy and and that he and this I had

11 199

12 00:09:47,889 --> 00:09:51,279

13 told him to keep his own fucking mouth

14 200

15 00:09:49,540 --> 00:09:53,230

16 shut and I found both of those

17 201

18 00:09:51,279 --> 00:09:55,149

19 statements concerning because some of

20 202

21 00:09:53,230 --> 00:09:57,430

22 the cute people in the past when they

23 203

24 00:09:55,149 --> 00:09:59,230

25 had psychologically attacked me they had

26 204

27 00:09:57,430 --> 00:10:00,670

28 said the same exact thing they had said

205

00:09:59,230 --> 00:10:02,740

just stop doing what you're doing you

206

00:10:00,670 --> 00:10:04,540

your own worst enemy stop covering this

1 207

00:10:02,740 --> 00:10:06,250

2 stuff you got it wrong and it just

3 208

4 00:10:04,540 --> 00:10:08,620

5 sounded so similar the wording of it

6 209

7 00:10:06,250 --> 00:10:10,660

that it sent a chill down my spine and

8 210

9 00:10:08,620 --> 00:10:14,529

10 then for him to start yelling at me

11 211

12 00:10:10,660 --> 00:10:16,089

after he you know slips up and says says

13 212

14 00:10:14,529 --> 00:10:17,589

15 that he told Tim home cept to keep his

16 213

17 00:10:16,089 --> 00:10:19,269

mouth shut I said to him why are you

18 214

19 00:10:17,589 --> 00:10:21,250

giving legal advice to Tim home Seth

20 215

21 00:10:19,269 --> 00:10:24,430

22 were you working in collusion with

23 216

24 00:10:21,250 --> 00:10:26,260

mystery working as a team to advise Tim

25 217

26 00:10:24,430 --> 00:10:28,120

27 home Seth you're not an attorney read

28 218

00:10:26,260 --> 00:10:30,550

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 39

1 Robert steel is not an attorney in any

2 219

3 00:10:28,120 --> 00:10:33,069

4 shape or form why was he giving Tim home

5 220

6 00:10:30,550 --> 00:10:34,540

7 Seth very sensitive legal advice it

8 221

9 00:10:33,069 --> 00:10:35,319

10 appears why was he tell him to keep his

11 222

12 00:10:34,540 --> 00:10:36,399

13 fucking mouth shut

14 223

15 00:10:35,319 --> 00:10:38,290

16 maybe you should have kept his mouth

17 224

18 00:10:36,399 --> 00:10:40,360

19 open maybe you should have the talking

20 225

21 00:10:38,290 --> 00:10:43,390

22 as loud as possible right maybe Stephen

23 226

24 00:10:40,360 --> 00:10:45,160

25 Biss is somebody who creeps in there and

26 227

27 00:10:43,390 --> 00:10:47,199

28 tells you to keep quiet until your trial

228

00:10:45,160 --> 00:10:49,630

well that's exactly the opposite of what

229

00:10:47,199 --> 00:10:51,940

truthers truth there's a home Seth

1 230

00:10:49,630 --> 00:10:53,470

2 situation or in my situation the exact

3 231

4 00:10:51,940 --> 00:10:56,019

5 opposite of what we should be doing and

6 232

7 00:10:53,470 --> 00:10:58,329

this should have disclosed on day one

8 233

9 00:10:56,019 --> 00:10:59,560

10 you should have disclosed on day one

11 234

12 00:10:58,329 --> 00:11:02,920

that he's represented the Clintons

13 235

14 00:10:59,560 --> 00:11:05,320

15 before this is this is crazy swamp

16 236

17 00:11:02,920 --> 00:11:06,880

is crazy swap stuff so that's what

18 237

19 00:11:05,320 --> 00:11:08,860

Robert David Steele did is he started

20 238

21 00:11:06,880 --> 00:11:10,000

22 yelling at me and said I don't like

23 239

24 00:11:08,860 --> 00:11:11,320

where this is heading

25 240

26 00:11:10,000 --> 00:11:13,089

I don't like where this is leading and

27 241

28 00:11:11,320 --> 00:11:14,620

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 41

1 then hung up on me right it was the

2 242

3 00:11:13,089 --> 00:11:16,570

4 weirdest thing I've ever encountered

5 243

6 00:11:14,620 --> 00:11:17,889

7 because normally when somebody says to

8 244

9 00:11:16,570 --> 00:11:19,959

10 you I don't like where this is heading

11 245

12 00:11:17,889 --> 00:11:21,970

13 where is this heading what are you

14 246

15 00:11:19,959 --> 00:11:23,740

16 talking about I'm not a prosecutor right

17 247

18 00:11:21,970 --> 00:11:25,389

19 are you are you some scam artist or

20 248

21 00:11:23,740 --> 00:11:26,970

22 something that you give Tim ohmsett bunk

23 249

24 00:11:25,389 --> 00:11:30,070

25 advice but you're not a lawyer at all

26 250

27 00:11:26,970 --> 00:11:31,959

28 right like what does that mean so I sent

29 251

30 00:11:30,070 --> 00:11:33,519

31 him a number of texts after that weird

32 252

33 00:11:31,959 --> 00:11:35,500

34 conversation where again he started

1 253

00:11:33,519 --> 00:11:37,959

2 yelling at me and then hung up on me

3 254

4 00:11:35,500 --> 00:11:39,550

5 which law enforcement if law enforcement

6 255

7 00:11:37,959 --> 00:11:42,579

wants to pull that conversation from

8 256

9 00:11:39,550 --> 00:11:45,339

10 Sunday June 16th in the morning I would

11 257

00:11:42,579 --> 00:11:47,769

12 highly encourage them to do so and they

13 258

14 00:11:45,339 --> 00:11:50,620

have my phone number already so here's

15 259

16 00:11:47,769 --> 00:11:52,329

17 what I texted Robert Steele and I got

18 260

19 00:11:50,620 --> 00:11:55,029

read receipts on the first to you these

20 261

21 00:11:52,329 --> 00:11:57,339

22 read receipts and that on the last two

23 262

24 00:11:55,029 --> 00:12:00,459

it appears he blocked me because no

25 263

26 00:11:57,339 --> 00:12:03,610

delivery no delivery receipt on iMessage

27 264

28 00:12:00,459 --> 00:12:05,709

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 43

1 you know no read receipt either I so

2 265

3 00:12:03,610 --> 00:12:07,420

4 here's what I texted I don't understand

5 266

6 00:12:05,709 --> 00:12:12,130

7 why you would give legal advice to Tim

8 267

9 00:12:07,420 --> 00:12:14,050

10 home Seth I don't understand why you

11 268

12 00:12:12,130 --> 00:12:16,209

13 would give legal advice to Tim home Seth

14 269

15 00:12:14,050 --> 00:12:19,870

16 nor why you referred me to Stephen Biss

17 270

18 00:12:16,209 --> 00:12:22,209

19 when mr. bists has defrauded me why did

20 271

21 00:12:19,870 --> 00:12:25,390

22 you strongly refer me to him and why the

23 272

24 00:12:22,209 --> 00:12:27,670

25 mere curiosity why didn't you just hang

26 273

27 00:12:25,390 --> 00:12:29,769

28 up on me no response right but I saw

29 274

30 00:12:27,670 --> 00:12:31,240

31 Denny read it normally when you ask

32 275

33 00:12:29,769 --> 00:12:33,279

34 somebody why'd you just hang up on me

1 276

00:12:31,240 --> 00:12:35,920

2 aren't I entitled to an answer the man

3 277

4 00:12:33,279 --> 00:12:37,660

5 who recommended me to my lawyer don't I

6 278

00:12:35,920 --> 00:12:39,370

7 deserve an answer as to why he started

8 279

9 00:12:37,660 --> 00:12:41,620

10 screaming at me and that hangs up on me

11 280

00:12:39,370 --> 00:12:44,199

12 this isn't a person I know well it's

13 281

00:12:41,620 --> 00:12:45,760

14 like this is some close friend this is

15 282

16 00:12:44,199 --> 00:12:47,110

17 some close friend who got angry at me

18 283

00:12:45,760 --> 00:12:49,120

19 this is somebody I barely even know

20 284

21 00:12:47,110 --> 00:12:52,240

22 whose professional colleague starts

23 285

00:12:49,120 --> 00:12:55,690

24 screaming at me and then hangs up so I

25 286

00:12:52,240 --> 00:12:58,420

26 texted him after that at 4:54 p.m. same

27 287

28 00:12:55,690 --> 00:13:02,560

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 45

1 day sorry the next day this is Monday

2 288

3 00:12:58,420 --> 00:13:04,779

4 June 17th at 4:54 p.m. and I texted him

5 289

6 00:13:02,560 --> 00:13:07,480

7 over iMessage why did you yell at me

8 290

9 00:13:04,779 --> 00:13:09,250

10 yesterday then hang up on me I was just

11 291

12 00:13:07,480 --> 00:13:11,829

13 asking about your relationship with

14 292

15 00:13:09,250 --> 00:13:13,870

16 Stephen Scott this any professional

17 293

18 00:13:11,829 --> 00:13:15,080

19 relationship you might have aside from

20 294

21 00:13:13,870 --> 00:13:18,110

22 your lawsuit

23 295

24 00:13:15,080 --> 00:13:20,420

25 and was asking about Tim home set whom

26 296

27 00:13:18,110 --> 00:13:23,060

28 you have apparently advised with mr.

29 297

30 00:13:20,420 --> 00:13:25,580

31 bise's help question mark is that

32 298

33 00:13:23,060 --> 00:13:27,140

34 correct for my records no response to

1 299

00:13:25,580 --> 00:13:30,350

2 that one but I saw that he read it on

3 300

4 00:13:27,140 --> 00:13:32,120

5 the same same day so I followed up and I

6 301

00:13:30,350 --> 00:13:34,040

7 said why are you silent on this

8 302

9 00:13:32,120 --> 00:13:39,740

10 shouldn't we be telling everyone home

11 303

00:13:34,040 --> 00:13:41,030

12 Seth needs help and then I my final text

13 304

14 00:13:39,740 --> 00:13:42,980

15 to him the one that was not received

16 305

00:13:41,030 --> 00:13:45,440

17 because I guess he blocked me at that

18 306

00:13:42,980 --> 00:13:47,630

19 point I said your silence as well as

20 307

21 00:13:45,440 --> 00:13:49,610

22 yelling at me yesterday then hanging up

23 308

00:13:47,630 --> 00:13:51,530

24 on me I just don't quite understand it

25 309

00:13:49,610 --> 00:13:54,230

26 especially when you're responsible

27 310

28 00:13:51,530 --> 00:13:57,290

1 solely for referring me to Steven Scott

2 311

3 00:13:54,230 --> 00:13:58,970

4 this why are you angry with me why is he

5 312

6 00:13:57,290 --> 00:14:00,800

7 angry with me right I should be angry at

8 313

9 00:13:58,970 --> 00:14:02,630

10 him wasted a year of my time by

11 314

12 00:14:00,800 --> 00:14:04,880

13 referring me to this lawyer and works by

14 315

15 00:14:02,630 --> 00:14:08,750

16 himself aside from his wife completely

17 316

18 00:14:04,880 --> 00:14:10,400

19 his own solo practice so why are you

20 317

21 00:14:08,750 --> 00:14:12,350

22 angry with me I have a few more

23 318

24 00:14:10,400 --> 00:14:13,430

25 questions please call at your earliest

26 319

27 00:14:12,350 --> 00:14:16,010

28 convenience

320

00:14:13,430 --> 00:14:18,650

I can also email my questions there is

321

00:14:16,010 --> 00:14:21,260

no response to that and it was not it

1 322

00:14:18,650 --> 00:14:23,870

2 appears it is not delivered because I've

3 323

4 00:14:21,260 --> 00:14:25,790

5 been blocked it appears so this is

6 324

7 00:14:23,870 --> 00:14:27,380

really this isn't okay folks you know to

8 325

9 00:14:25,790 --> 00:14:29,540

10 do this to Tim home Seth and he was a

11 326

12 00:14:27,380 --> 00:14:31,570

great newspaper reporter and to waste

13 327

14 00:14:29,540 --> 00:14:35,000

the year of my time when I was such a

15 328

16 00:14:31,570 --> 00:14:37,100

17 you know this was such a excited Trump

18 329

19 00:14:35,000 --> 00:14:40,100

supporter back in the day it was so

20 330

21 00:14:37,100 --> 00:14:42,470

22 excited to move here to DC wasn't really

23 331

24 00:14:40,100 --> 00:14:45,200

counting on a year of being worn down by

25 332

26 00:14:42,470 --> 00:14:49,760

27 people like this but this is not right

28 333

00:14:45,200 --> 00:14:52,820

1 right yeah why is he not angry about my

2 334

3 00:14:49,760 --> 00:15:00,170

4 15 K being taken and I get no no

5 335

6 00:14:52,820 --> 00:15:01,610

7 recourse and I get no justice yeah I

8 336

9 00:15:00,170 --> 00:15:03,170

10 think they were trying to manipulate me

11 337

12 00:15:01,610 --> 00:15:05,750

13 I had a couple of friends look at my

14 338

15 00:15:03,170 --> 00:15:08,360

16 text with my text back and forth with

17 339

18 00:15:05,750 --> 00:15:10,190

19 this and they said wow this is this is

20 340

21 00:15:08,360 --> 00:15:12,740

22 not normal attorney-client relationship

23 341

24 00:15:10,190 --> 00:15:14,180

25 and I was like really and they're like

26 342

27 00:15:12,740 --> 00:15:16,730

28 yeah he's manipulating you

343

00:15:14,180 --> 00:15:18,080

he's is psychologically manipulating you

344

00:15:16,730 --> 00:15:19,880

is trying to make you feel bad

1 345

00:15:18,080 --> 00:15:21,470
2 shouldn't be trying to alter your

3 346

4 00:15:19,880 --> 00:15:24,680
5 emotions at all you should just

6 347

00:15:21,470 --> 00:15:27,170
7 represent their case you know it's

8 348

9 00:15:24,680 --> 00:15:28,329
10 certainly for \$15,000 I'm entitled to a

11 349

00:15:27,170 --> 00:15:30,129
12 call back

13 350

00:15:28,329 --> 00:15:32,619
14 I'm entitled to a text message right

15 351

16 00:15:30,129 --> 00:15:34,059
17 Steven this appears it appears he lied

18 352

00:15:32,619 --> 00:15:37,980
19 to me today right we showed you that

20 353

21 00:15:34,059 --> 00:15:40,420
22 Justia filing you can find it right here

23 354

00:15:37,980 --> 00:15:45,119
24 there's his name Steven Scott this

25 355

00:15:40,420 --> 00:15:47,559
26 Steven Scopus on the defense team of

27 356

28 00:15:45,119 --> 00:15:51,489

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 51

1 Steven Scott this on the defense team

2 357

3 00:15:47,559 --> 00:15:53,529
4 for William Jefferson Clinton and the

5 358

6 00:15:51,489 --> 00:15:57,459
7 place where he was practicing at that

8 359

9 00:15:53,529 --> 00:15:58,809
10 point in time uh and to text me back and

11 360

12 00:15:57,459 --> 00:16:00,910
13 say happy fourth of July

14 361

15 00:15:58,809 --> 00:16:02,739
16 you've been fed more bad Intel I have

17 362

18 00:16:00,910 --> 00:16:04,360
19 never represented the Clintons or either

20 363

21 00:16:02,739 --> 00:16:07,509
22 of them or any member of their family

23 364

24 00:16:04,360 --> 00:16:09,610
25 have a good day well I wasn't fed this

26 365

27 00:16:07,509 --> 00:16:13,149
28 again I literally just searched for your

366

00:16:09,610 --> 00:16:15,989
name on Justia and these official court

367

00:16:13,149 --> 00:16:19,389
records come up and here you are as

1 368

00:16:15,989 --> 00:16:22,470

2 clear as day as clear as a bright sunny

3 369

4 00:16:19,389 --> 00:16:22,470

5 day so

6 370

00:16:33,130 --> 00:16:36,130

7 yeah

8 371

9 00:16:36,350 --> 00:16:40,740

10 well that's that's what I want to find

11 372

00:16:38,610 --> 00:16:43,290

12 out he's been disbarred before he was

13 373

00:16:40,740 --> 00:16:45,300

14 disbarred by Virginia for more than a

15 374

16 00:16:43,290 --> 00:16:47,490

17 year and I've already contacted the

18 375

00:16:45,300 --> 00:16:50,040

19 Virginia State Bar about him and I've

20 376

21 00:16:47,490 --> 00:16:52,080

22 contacted one federal agency and I'm

23 377

00:16:50,040 --> 00:16:56,040

24 gonna contact so many more it's just

25 378

00:16:52,080 --> 00:16:58,410

26 that the way to do things in DC you

27 379

28 00:16:56,040 --> 00:16:59,880

1 don't want to you don't want a carpetbag

2 380

3 00:16:58,410 --> 00:17:01,410

4 them you know you don't want to contact

5 381

6 00:16:59,880 --> 00:17:04,140

7 a bunch of different agencies because I

8 382

9 00:17:01,410 --> 00:17:05,910

10 want to see this first agency look into

11 383

12 00:17:04,140 --> 00:17:08,190

13 Steven Scott this there's a lot of

14 384

15 00:17:05,910 --> 00:17:10,230

16 there's a lot of stuff here you know

17 385

18 00:17:08,190 --> 00:17:12,210

19 this is not the way to treat another man

20 386

21 00:17:10,230 --> 00:17:13,800

22 the way I was treated by Steven Scott

23 387

24 00:17:12,210 --> 00:17:15,450

25 this as I've said before in the

26 388

27 00:17:13,800 --> 00:17:17,130

28 newsletter I've never been treated this

389

00:17:15,450 --> 00:17:18,090

bad by another man before in my entire

390

00:17:17,130 --> 00:17:22,230

life

1 391

00:17:18,090 --> 00:17:23,610

2 right I mean even John Podesta he didn't

3 392

4 00:17:22,230 --> 00:17:25,320

5 do anything to me right didn't do

6 393

00:17:23,610 --> 00:17:27,600

7 anything to me personally I just

8 394

9 00:17:25,320 --> 00:17:29,720

10 stumbled across his emails and this is a

11 395

00:17:27,600 --> 00:17:32,310

12 guy who personally took my money and

13 396

00:17:29,720 --> 00:17:34,050

14 personally wasted a year of my time and

15 397

16 00:17:32,310 --> 00:17:35,940

17 may have been leading me to the

18 398

00:17:34,050 --> 00:17:38,730

19 slaughter right may have been leading me

20 399

21 00:17:35,940 --> 00:17:40,920

22 to a fate a very similar to what

23 400

00:17:38,730 --> 00:17:42,990

24 happened at Tim home Seth and I can read

25 401

00:17:40,920 --> 00:17:45,570

26 to you guys with a former judge emailed

27

402

28 00:17:42,990 --> 00:17:48,060

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 55

1 me a friend of ours friend of ours who's

2 403

3 00:17:45,570 --> 00:17:51,690
4 a former judge if I can find it I'll

5 404

6 00:17:48,060 --> 00:17:53,790
7 read it for you guys I did demand a

8 405

9 00:17:51,690 --> 00:17:55,320
10 refund and he refused to give one he

11 406

12 00:17:53,790 --> 00:17:57,840
13 refused to give one and it took him

14 407

15 00:17:55,320 --> 00:18:01,290
16 almost the week took him almost five

17 408

18 00:17:57,840 --> 00:18:02,700
19 days to produce produce his expenses for

20 409

21 00:18:01,290 --> 00:18:04,620
22 me which is weird because it should just

23 410

24 00:18:02,700 --> 00:18:06,960
25 be an email away right if you have your

26 411

27 00:18:04,620 --> 00:18:08,640
28 expenses already reported somewhere you

412

00:18:06,960 --> 00:18:11,190
should just be able to email it to me it

413

00:18:08,640 --> 00:18:12,960
shouldn't take four or five days before

1 414

00:18:11,190 --> 00:18:16,680

2 you need to produce that you know before

3 415

4 00:18:12,960 --> 00:18:20,280

5 you're able to produce that so I'm very

6 416

00:18:16,680 --> 00:18:22,820

7 very unhappy with the way these things

8 417

9 00:18:20,280 --> 00:18:22,820

10 have gone

11 418

00:18:46,040 --> 00:18:52,070

12 and multiple times he tried to drop me

13 419

00:18:49,460 --> 00:18:53,780

14 when I needed his help right he did that

15 420

16 00:18:52,070 --> 00:18:56,690

17 in the New York case by eight days

18 421

00:18:53,780 --> 00:18:58,370

19 before saying hey up dear gonna be goin

20 422

21 00:18:56,690 --> 00:19:01,040

22 pro se up in New York gonna be

23 423

00:18:58,370 --> 00:19:03,500

24 representing yourself before this Obama

25 424

00:19:01,040 --> 00:19:06,380

26 appointed judge Obama appointed federal

27 425

28 00:19:03,500 --> 00:19:08,300

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 57

1 judge and he said to me he was he was

2 426

3 00:19:06,380 --> 00:19:09,950

4 kind of trying to stress me out he was

5 427

6 00:19:08,300 --> 00:19:11,840

7 trying to stress me out on the phone to

8 428

9 00:19:09,950 --> 00:19:14,360

10 me I said to him is this a bad thing

11 429

12 00:19:11,840 --> 00:19:17,000

13 that she's an Obama appointee and he

14 430

15 00:19:14,360 --> 00:19:20,090

16 said well you better hope that she hates

17 431

18 00:19:17,000 --> 00:19:22,310

19 The Daily Beast better hope that she

20 432

21 00:19:20,090 --> 00:19:24,650

22 hates The Daily Beast more than she

23 433

24 00:19:22,310 --> 00:19:26,720

25 hates you and I said to him at the time

26 434

27 00:19:24,650 --> 00:19:28,670

28 what does that mean what does that mean

435

00:19:26,720 --> 00:19:30,410

you're my lawyer better hope she hates

436

00:19:28,670 --> 00:19:31,880

The Daily Beast more than she hates me

1 437

00:19:30,410 --> 00:19:33,440

2 why would he hate me at all

3 438

4 00:19:31,880 --> 00:19:35,870

5 I mean I'm sorry why would she hate me

6 439

00:19:33,440 --> 00:19:37,760

7 at all for outing a potential child

8 440

9 00:19:35,870 --> 00:19:39,500

10 trafficker based on WikiLeaks emails

11 441

00:19:37,760 --> 00:19:41,450

12 that are very credible why would she

13 442

00:19:39,500 --> 00:19:43,250

14 hate that for filing a defamation case

15 443

16 00:19:41,450 --> 00:19:46,130

17 because I don't like being smeared on

18 444

00:19:43,250 --> 00:19:48,740

19 the basis of my research which is just

20 445

00:19:46,130 --> 00:19:50,120

21 reading some WikiLeaks emails why would

22 446

00:19:48,740 --> 00:19:53,530

24 why would that be the outcome why would

25 447

00:19:50,120 --> 00:19:53,530

26 I be hated and

27 448

28 00:20:12,720 --> 00:20:18,800

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 59

1 yeah I'm afraid I'm afraid that was the

2 449

3 00:20:15,800 --> 00:20:18,800
scenario

4 450

5 00:20:36,330 --> 00:20:42,930
6 all right so here's I found it sorry for

7 451

8 00:20:38,460 --> 00:20:45,360
the play this is from a friend of ours

9 452

10 00:20:42,930 --> 00:20:50,090
11 who's a former judge and current

12 453

13 00:20:45,360 --> 00:20:50,090
practicing attorney and he wrote to me

14 454

15 00:21:06,480 --> 00:21:09,680
16 can't find it more

17 455

18 00:21:16,700 --> 00:21:21,769
all right here we go I found it he said

19 456

20 00:21:19,460 --> 00:21:23,720
rule 11 is for filing or continuing with

21 457

22 00:21:21,769 --> 00:21:25,399
23 a lawsuit when it is frivolous the

24 458

25 00:21:23,720 --> 00:21:27,769
defendants attorneys would have sent you

26 459

27 00:21:25,399 --> 00:21:30,409
a letter as a pro se to drop the lawsuit

28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 60

1 460
00:21:27,769 --> 00:21:32,809
2 in her face spines normally it would not

3 461
4 00:21:30,409 --> 00:21:35,330
5 apply an effect based situation but with

6 462
00:21:32,809 --> 00:21:37,549
7 an Obama judge it was the real

8 463
9 00:21:35,330 --> 00:21:39,950
10 possibility in my opinion what your

11 464
00:21:37,549 --> 00:21:43,519
12 lawyer did to you is disgusting if you

13 465
00:21:39,950 --> 00:21:44,359
14 pay it any money demand a full refund so

15 466
16 00:21:43,519 --> 00:21:46,309
17 again one more time

18 467
00:21:44,359 --> 00:21:49,700
19 this is friend of mine whose former

20 468
21 00:21:46,309 --> 00:21:52,220
22 judge and current attorney an attorney

23 469
00:21:49,700 --> 00:21:54,109
24 here on the East Coast a rule evidence

25 470
26 00:21:52,220 --> 00:21:56,119
for filing or continuing with a lawsuit

27 471
28 00:21:54,109 --> 00:21:57,499

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 61

1 when it is frivolous the defendants

2 472

3 00:21:56,119 --> 00:22:00,230

attorneys would have sent you a letter

4 473

5 00:21:57,499 --> 00:22:02,539

6 as a pro se to drop the lawsuit or face

7 474

8 00:22:00,230 --> 00:22:04,759

fines normally it would not apply an

9 475

10 00:22:02,539 --> 00:22:06,859

11 effect based situation but with an Obama

12 476

13 00:22:04,759 --> 00:22:09,019

judge it was a real possibility in my

14 477

15 00:22:06,859 --> 00:22:11,629

16 opinion what your lawyer did to you is

17 478

18 00:22:09,019 --> 00:22:15,440

disgusting if he paid any money demand a

19 479

20 00:22:11,629 --> 00:22:17,929

full refund and Stephen BIST also

21 480

22 00:22:15,440 --> 00:22:19,730

23 threatened to sue me threatened to sue

24 481

25 00:22:17,929 --> 00:22:22,070

me when I explained him that this is

26 482

27 00:22:19,730 --> 00:22:23,809

28 simply not acceptable right this is not

1 483

00:22:22,070 --> 00:22:26,029
2 acceptable treatment of another human

3 484

00:22:23,809 --> 00:22:27,710
4 being and certainly when you used to

5 485

00:22:26,029 --> 00:22:29,330
6 work with the Clintons it's not

7 486

00:22:27,710 --> 00:22:31,070
8 acceptable treatment of the person he

9 487

00:22:29,330 --> 00:22:33,279
10 brought down John Podesta right there's

11 488

00:22:31,070 --> 00:22:41,419
12 a material conflict of interest here and

13 489

00:22:33,279 --> 00:22:44,480
14 it's simply unacceptable and here's

15 490

00:22:41,419 --> 00:22:46,190
16 here's the threat from Steven bish I'll

17 491

00:22:44,480 --> 00:22:52,129
18 bring it up on screen so you guys can

19 492

00:22:46,190 --> 00:22:53,330
20 see it there's his threat so this is

21 493

00:22:52,129 --> 00:22:55,570
22 what this guy meant to be just

23 494

00:22:53,330 --> 00:22:57,379

1 intimidating me at every step of the way

2 495

3 00:22:55,570 --> 00:22:58,820

4 intimidating needed every step of the

5 496

6 00:22:57,379 --> 00:22:59,720

7 way and if he thought that I wanted out

8 497

9 00:22:58,820 --> 00:23:01,820

10 what he's done

11 498

12 00:22:59,720 --> 00:23:03,529

13 I'm the person who outed John Podesta so

14 499

15 00:23:01,820 --> 00:23:05,779

16 he's absolutely wrong I don't like

17 500

18 00:23:03,529 --> 00:23:08,090

19 having \$15,000 in the year of my time

20 501

21 00:23:05,779 --> 00:23:09,919

22 wasted and being constantly stressed out

23 502

24 00:23:08,090 --> 00:23:13,759

25 when now I realize that they have been

26 503

27 00:23:09,919 --> 00:23:16,820

28 theatrics theatrics between him and fat

504

00:23:13,759 --> 00:23:19,249

hog Robert David Steele just to stress

505

00:23:16,820 --> 00:23:23,869

me out not to help me out to stress me

1 506

00:23:19,249 --> 00:23:26,210
2 out so here's what Stephen abyss texted

3 507

4 00:23:23,869 --> 00:23:28,340
5 me and I have copies of this with

6 508

7 00:23:26,210 --> 00:23:30,080
multiple people it's backed up all over

8 509

9 00:23:28,340 --> 00:23:30,600
10 the place here to put a bullet in my

11 510

12 00:23:30,080 --> 00:23:32,370
head

13 511

14 00:23:30,600 --> 00:23:34,500
it wouldn't impact the availability of

15 512

16 00:23:32,370 --> 00:23:37,700
17 this information at all and again I'm

18 513

19 00:23:34,500 --> 00:23:39,960
contacting everybody absolutely

20 514

21 00:23:37,700 --> 00:23:42,930
22 everybody just giving it time because I

23 515

24 00:23:39,960 --> 00:23:45,990
want to see if that first agency that

25 516

26 00:23:42,930 --> 00:23:48,180
first agency can do something David I

27 517

28 00:23:45,990 --> 00:23:49,080

1 know who you have talked to and what

2 518

3 00:23:48,180 --> 00:23:50,700

4 you've said

5 519

6 00:23:49,080 --> 00:23:53,010

7 I have voiced recordings of the

8 520

9 00:23:50,700 --> 00:23:55,140

10 falsehoods what a creep what does that

11 521

12 00:23:53,010 --> 00:23:57,750

13 even mean you fucking creep does that

14 522

15 00:23:55,140 --> 00:23:59,250

16 mean you watch the live stream does that

17 523

18 00:23:57,750 --> 00:24:01,950

19 mean you used to work for the Clinton

20 524

21 00:23:59,250 --> 00:24:03,510

22 sin you're a fucking midget creep David

23 525

24 00:24:01,950 --> 00:24:04,260

25 I know who you have talked to and what

26 526

27 00:24:03,510 --> 00:24:06,740

28 you've said

527

00:24:04,260 --> 00:24:10,290

I have voice recordings of falsehoods

528

00:24:06,740 --> 00:24:12,480

tomorrow I will prepare invoices and

1 529

00:24:10,290 --> 00:24:14,550

2 final accountings I will count to you

3 530

4 00:24:12,480 --> 00:24:16,980

5 for every task performed and every

6 531

00:24:14,550 --> 00:24:20,150

7 minute of my time I assure you all time

8 532

9 00:24:16,980 --> 00:24:23,190

10 will be accounted for from the flat fee

11 533

00:24:20,150 --> 00:24:26,070

12 \$15,000 I will deduct the actual hours

13 534

14 00:24:23,190 --> 00:24:28,530

15 spent on your cases and will refund any

16 535

00:24:26,070 --> 00:24:31,140

17 balance left after payment of my fees if

18 536

00:24:28,530 --> 00:24:34,230

19 there is any dispute after you review my

20 537

21 00:24:31,140 --> 00:24:37,830

22 final invoices and accountings I will

23 538

00:24:34,230 --> 00:24:40,710

24 see you and deposit the 15k in court

25 539

00:24:37,830 --> 00:24:43,650

26 pending a determination of what fees you

27 540

28 00:24:40,710 --> 00:24:46,110

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 67

1 owe I will not dignify your unjustified

2 541

3 00:24:43,650 --> 00:24:48,510

4 personal attacks have a good day and

5 542

6 00:24:46,110 --> 00:24:50,490

7 I've talked I've talked to friends in

8 543

9 00:24:48,510 --> 00:24:51,990

10 the legal profession and every single

11 544

12 00:24:50,490 --> 00:24:54,450

13 one of them has even told me that this

14 545

15 00:24:51,990 --> 00:24:56,670

16 is bizarre right that normally attorneys

17 546

18 00:24:54,450 --> 00:24:59,250

19 don't threaten to sue you when you ask

20 547

21 00:24:56,670 --> 00:25:01,800

22 to see some breakdown of expenses right

23 548

24 00:24:59,250 --> 00:25:04,140

25 I don't feel that \$15,000 of work was

26 549

27 00:25:01,800 --> 00:25:06,270

28 done and I wanted to see what it is that

550

00:25:04,140 --> 00:25:07,890

he had done and I'm not convinced that

551

00:25:06,270 --> 00:25:09,960

what he sent me was satisfactory

1 552

00:25:07,890 --> 00:25:11,490

2 and I'm not convinced that the amounts

3 553

4 00:25:09,960 --> 00:25:16,020

5 are accurate because it seems like he's

6 554

7 00:25:11,490 --> 00:25:17,250

done very little work yeah and what's so

8 555

9 00:25:16,020 --> 00:25:18,900

10 bad about what he did is he told me to

11 556

00:25:17,250 --> 00:25:21,630

12 be quiet the whole time I could have

13 557

14 00:25:18,900 --> 00:25:23,850

raised hell here in DC I could have

15 558

16 00:25:21,630 --> 00:25:25,860

17 raised absolute hell and he told me to

18 559

19 00:25:23,850 --> 00:25:28,590

be quiet for a year now I've lost my

20 560

21 00:25:25,860 --> 00:25:30,930

22 audience thank God the 20 disciples are

23 561

24 00:25:28,590 --> 00:25:32,190

always here no the 20 viewers are always

25 562

26 00:25:30,930 --> 00:25:35,220

here thank you guys so much

27 563

28 00:25:32,190 --> 00:25:37,020

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 69

1 you're my extended family but you know

2 564

3 00:25:35,220 --> 00:25:39,180

4 like they knocked me out I was actually

5 565

6 00:25:37,020 --> 00:25:40,740

7 making a difference in the world we had

8 566

9 00:25:39,180 --> 00:25:43,590

10 hundreds of thousands of people is

11 567

12 00:25:40,740 --> 00:25:44,160

13 sending this stuff instead of 20 20 or

14 568

15 00:25:43,590 --> 00:25:54,360

16 21

17 569

18 00:25:44,160 --> 00:25:57,480

19 or 22 right that was that was sort of my

20 570

21 00:25:54,360 --> 00:25:59,100

22 question yeah how is that not a threat

23 571

24 00:25:57,480 --> 00:26:01,140

25 especially when he's an attorney when

26 572

27 00:25:59,100 --> 00:26:02,760

28 I'm stressed out when I'm stressed out

573

00:26:01,140 --> 00:26:04,200

he knows that I'm down to the last of my

574

00:26:02,760 --> 00:26:06,000

resources he knows what I've been

1 575

00:26:04,200 --> 00:26:08,820

2 through more than anybody because he had

3 576

4 00:26:06,000 --> 00:26:10,680

5 me take him through it in detail to have

6 577

00:26:08,820 --> 00:26:12,750

7 a guy who used to work for the Clintons

8 578

9 00:26:10,680 --> 00:26:15,000

10 to have him pick apart everything

11 579

00:26:12,750 --> 00:26:16,650

12 everything relevant to what's been done

13 580

14 00:26:15,000 --> 00:26:18,660

15 to you and to give over all this

16 581

00:26:16,650 --> 00:26:20,850

17 information and then to find out that

18 582

00:26:18,660 --> 00:26:22,830

19 he's not your advocate it's like finding

20 583

21 00:26:20,850 --> 00:26:24,540

22 out that your therapist was a predator

23 584

00:26:22,830 --> 00:26:26,400

24 you know that's like finding out you've

25 585

00:26:24,540 --> 00:26:29,550

26 had a predatory therapist it's like hey

27 586

28 00:26:26,400 --> 00:26:32,040

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 71

1 this ain't this ain't okay but grateful

2 587

3 00:26:29,550 --> 00:26:33,900

4 grateful because what this guy has done

5 588

6 00:26:32,040 --> 00:26:35,280

7 to me is so bad I don't even care about

8 589

9 00:26:33,900 --> 00:26:37,320

10 John Podesta anymore

11 590

12 00:26:35,280 --> 00:26:39,660

13 Red John Podesta could walk by me on the

14 591

15 00:26:37,320 --> 00:26:42,420

16 sidewalk later today and I would just

17 592

18 00:26:39,660 --> 00:26:44,790

19 wave because he's done nothing to me

20 593

21 00:26:42,420 --> 00:26:46,890

22 personally in fact I probably fucked up

23 594

24 00:26:44,790 --> 00:26:49,290

25 his whole life he was an Illuminati

26 595

27 00:26:46,890 --> 00:26:51,180

28 pedalboard paradise land you know I

596

00:26:49,290 --> 00:26:52,410

probably fucked up his life by sticking

597

00:26:51,180 --> 00:26:54,420

to that story

1 598

00:26:52,410 --> 00:26:57,240

2 so Podesta's done nothing to me

3 599

4 00:26:54,420 --> 00:26:59,370

5 personally as far as I can tell this guy

6 600

00:26:57,240 --> 00:27:01,560

7 wasted a year of my time how do we make

8 601

9 00:26:59,370 --> 00:27:03,120

10 this right and again to threaten me when

11 602

00:27:01,560 --> 00:27:04,560

12 even giving back half of that money

13 603

14 00:27:03,120 --> 00:27:06,330

15 would have made such a difference to be

16 604

00:27:04,560 --> 00:27:09,930

17 mentally so I feel like I didn't get

18 605

00:27:06,330 --> 00:27:12,120

19 totally just fucking totally gifted you

20 606

21 00:27:09,930 --> 00:27:14,640

22 know it's the solo lawyer who just

23 607

00:27:12,120 --> 00:27:18,330

24 totally took advantage of me and his

25 608

26 00:27:14,640 --> 00:27:20,670

wife that number bounces by the way his

27 609

28 00:27:18,330 --> 00:27:34,980

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 73

1 wife leaving those voicemails I've tried

2 610

3 00:27:20,670 --> 00:27:38,250
4 to call that number back here it's not

5 611

6 00:27:34,980 --> 00:27:42,240
wild isn't that wild and then here's the

7 612

8 00:27:38,250 --> 00:27:45,240
voicemail from Stephen Miss 1228

9 613

10 00:27:42,240 --> 00:27:47,490
11 December 28th of last year that gives

12 614

13 00:27:45,240 --> 00:27:49,350
you an idea of how he tried how do you

14 615

15 00:27:47,490 --> 00:27:51,240
16 try to shake me up I know there's a

17 616

18 00:27:49,350 --> 00:27:53,820
problem you gotta call me there's just

19 617

20 00:27:51,240 --> 00:27:56,700
drama just drama between him and steel

21 618

22 00:27:53,820 --> 00:27:57,250
23 trying to drive me under but now we get

24 619

25 00:27:56,700 --> 00:27:59,170
a hundred

26 620

27 00:27:57,250 --> 00:28:01,840
thousand times louder go to massive

28 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 74

1 621

00:27:59,170 --> 00:28:04,330

2 fucking pedophile Podesta's every report

3 622

4 00:28:01,840 --> 00:28:06,220

5 Robert David steel everywhere necessary

6 623

7 00:28:04,330 --> 00:28:08,020

until he's disbarred for life from the

8 624

9 00:28:06,220 --> 00:28:09,550

10 legal profession because again I've

11 625

00:28:08,020 --> 00:28:11,710

12 talked to enough people who have told me

13 626

14 00:28:09,550 --> 00:28:14,320

15 that this guy was predatory to me I'm

16 627

00:28:11,710 --> 00:28:15,670

17 not I'm not a little girl right now but

18 628

19 00:28:14,320 --> 00:28:17,710

enough people have told me he's been a

20 629

21 00:28:15,670 --> 00:28:39,520

22 predator a professional predator that

23 630

00:28:17,710 --> 00:28:41,230

24 I'm starting to believe and that that

25 631

26 00:28:39,520 --> 00:28:43,420

procedural issue by the way if I

27 632

28 00:28:41,230 --> 00:28:45,310

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 75

1 remember correctly was him telling me

2 633

3 00:28:43,420 --> 00:28:47,260

4 that Jennings Brown would have to be

5 634

6 00:28:45,310 --> 00:28:49,660

7 dropped as a defense did right the

8 635

9 00:28:47,260 --> 00:28:51,520

10 person that I wanted to sue cuz he's the

11 636

12 00:28:49,660 --> 00:28:54,040

13 person who wrote the article about me

14 637

15 00:28:51,520 --> 00:28:55,870

16 had to be dropped as a defendant this is

17 638

18 00:28:54,040 --> 00:28:57,250

19 that competent law fair right there oh

20 639

21 00:28:55,870 --> 00:28:58,780

22 we got it we gotta drop the lawsuit

23 640

24 00:28:57,250 --> 00:29:00,340

25 against the guy that you want to sue

26 641

27 00:28:58,780 --> 00:29:02,290

28 he's the guy who wrote the article

642

00:29:00,340 --> 00:29:04,450

instead we're gonna sue just the parent

643

00:29:02,290 --> 00:29:06,760

company just the company that owns the

1 644

00:29:04,450 --> 00:29:07,930

2 Daily Beast and The Daily Beast okay

3 645

4 00:29:06,760 --> 00:29:09,970

5 well don't you know that is a lawyer

6 646

00:29:07,930 --> 00:29:12,580

7 don't you know how to add somebody as

8 647

9 00:29:09,970 --> 00:29:13,920

10 offended and not have it be fucked up

11 648

00:29:12,580 --> 00:29:16,690

12 haven't you been doing this for decades

13 649

00:29:13,920 --> 00:29:19,260

14 you know I have it even filing lawsuits

15 650

16 00:29:16,690 --> 00:29:19,260

17 for that goods

18 651

00:29:37,830 --> 00:29:45,529

19 a student from 10 12:30 on Friday you

20 652

21 00:29:41,970 --> 00:29:51,299

22 call is necessary to talk to families

23 653

00:29:45,529 --> 00:29:53,610

24 about just some procedural issues on the

25 654

00:29:51,299 --> 00:29:59,580

26 precip you have to file today so give me

27 655

28 00:29:53,610 --> 00:30:02,009

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 77

1 a call when you get this message back ya

2 656

3 00:29:59,580 --> 00:30:09,360

4 know 20 people is correct 20 people it's

5 657

6 00:30:02,009 --> 00:30:14,369

7 more than enough I mean I'm seeing 156

8 658

9 00:30:09,360 --> 00:30:16,739

10 comments so far 156 comments so I mean

11 659

12 00:30:14,369 --> 00:30:18,389

13 how is it still 19 people watching you

14 660

15 00:30:16,739 --> 00:30:27,539

16 guys might be right might be more

17 661

18 00:30:18,389 --> 00:30:30,539

19 numbers than that I realize it's not

20 662

21 00:30:27,539 --> 00:30:32,730

22 Trump's job it's not Trump's job to look

23 663

24 00:30:30,539 --> 00:30:35,669

25 out for everybody who supports him and I

26 664

27 00:30:32,730 --> 00:30:38,460

28 realized he's not like not like the MOG

665

00:30:35,669 --> 00:30:40,470

and dad but he sort of is right he's let

666

00:30:38,460 --> 00:30:42,480

all of us go under and it would have

1 667

00:30:40,470 --> 00:30:44,879

2 taken all of a minute to cleared up this

3 668

4 00:30:42,480 --> 00:30:46,409

5 Podesta stuff right to clear this up to

6 669

7 00:30:44,879 --> 00:30:47,730

8 put that piece of shit in prison at this

9 670

00:30:46,409 --> 00:30:49,980

10 point would have taken all of a minute

11 671

00:30:47,730 --> 00:30:53,159

12 instead it's the slow and methodical

13 672

14 00:30:49,980 --> 00:30:55,080

15 takedown of every single one of us right

16 673

17 00:30:53,159 --> 00:30:57,210

18 to home Seth was one of my favorite

19 674

00:30:55,080 --> 00:30:59,669

20 people listen to you about this pedo

21 675

00:30:57,210 --> 00:31:05,549

22 gate stuff was one of my favorite people

23 676

00:30:59,669 --> 00:31:07,950

24 listened to and now he's either rotting

25 677

00:31:05,549 --> 00:31:10,619

26 in jail in Crookston Minnesota where has

27 678

28 00:31:07,950 --> 00:31:13,019

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 79

1 disappeared and you know as of just

2 679

3 00:31:10,619 --> 00:31:15,809

4 earlier today Stephen Scott Busse is

5 680

6 00:31:13,019 --> 00:31:17,970

7 still not answering my extremely simply

8 681

9 00:31:15,809 --> 00:31:19,649

10 worded question I'm not trying to be

11 682

12 00:31:17,970 --> 00:31:21,960

13 complicated not trying to be a Riddler

14 683

15 00:31:19,649 --> 00:31:25,200

16 like cumin on a very simple question

17 684

18 00:31:21,960 --> 00:31:28,489

19 what happened to Tim home Seth why can't

20 685

21 00:31:25,200 --> 00:31:28,489

22 he answer that question

23 686

24 00:31:45,550 --> 00:31:51,620

25 yeah I mean now you guys understand more

26 687

27 00:31:48,200 --> 00:31:54,350

28 why I retired as I figured out how deep

688

00:31:51,620 --> 00:31:56,780

this is I don't know if I want to be in

689

00:31:54,350 --> 00:31:58,250

DC anymore I don't even know if I want

1 690
00:31:56,780 --> 00:32:01,160
2 to be in America anymore all right these

3 691
4 00:31:58,250 --> 00:32:02,900
5 people tried to put me in prison the way

6 692
00:32:01,160 --> 00:32:05,510
7 they did to Tim home set that appears

8 693
9 00:32:02,900 --> 00:32:07,970
10 simply because I read John Podesta C

11 694
00:32:05,510 --> 00:32:10,460
12 mails and Julian Assange is rotting away

13 695
00:32:07,970 --> 00:32:13,160
14 and nobody seems to care he's in

15 696
16 00:32:10,460 --> 00:32:16,179
17 solitary confinement in Belmarsh and the

18 697
00:32:13,160 --> 00:32:18,320
19 UK awaiting transferred here in the US

20 698
21 00:32:16,179 --> 00:32:20,690
22 and it's like nobody cares anymore

23 699
00:32:18,320 --> 00:32:24,040
24 everybody's all happy with why he's so

25 700
26 00:32:20,690 --> 00:32:24,040
happy that there's no justice

27 701
28 00:32:49,330 --> 00:32:55,029

1 and it's it's sunny Robert Steele that

2 702

3 00:32:52,659 --> 00:32:56,379
4 phone conversation with him before he

5 703

6 00:32:55,029 --> 00:32:58,179
7 started getting nasty

8 704

9 00:32:56,379 --> 00:33:01,299
10 before I started getting nasty with me

11 705

12 00:32:58,179 --> 00:33:04,330
13 weird he tells me that I should I should

14 706

15 00:33:01,299 --> 00:33:06,580
16 team up with Dustin Deimos and he's like

17 707

18 00:33:04,330 --> 00:33:08,169
19 Dustin emotes working on hole watch

20 708

21 00:33:06,580 --> 00:33:09,039
22 illegal stuff to take down the

23 709

24 00:33:08,169 --> 00:33:11,499
25 censorship

26 710

27 00:33:09,039 --> 00:33:13,899
28 Dustin Deimos you mean the felon dust

711

00:33:11,499 --> 00:33:15,639
and Krieger you mean cute art felon dust

712

00:33:13,899 --> 00:33:16,720
and Krieger but I don't believe even

1 713

00:33:15,639 --> 00:33:19,029

2 voting for Trump

3 714

4 00:33:16,720 --> 00:33:20,499

5 Fallon Dustin Krieger you mean him the

6 715

7 00:33:19,029 --> 00:33:21,789

guy who's been reading your posts about

8 716

9 00:33:20,499 --> 00:33:23,679

10 me for the last year and a half

11 717

00:33:21,789 --> 00:33:27,429

12 calling me fake Mogga and evil and all

13 718

14 00:33:23,679 --> 00:33:31,090

15 this stuff okay to serial felon dust the

16 719

00:33:27,429 --> 00:33:34,570

17 Krieger I don't want to work with him or

18 720

00:33:31,090 --> 00:33:36,759

19 many also Robert David Steele asked me

20 721

21 00:33:34,570 --> 00:33:38,859

22 if I want to testify if I want to

23 722

00:33:36,759 --> 00:33:41,440

24 testify for his court case against

25 723

26 00:33:38,859 --> 00:33:43,809

Goodman no I don't want to testify if

27 724

28 00:33:41,440 --> 00:33:45,789

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 83

1 you dragged me in to testify I'm gonna

2 725

3 00:33:43,809 --> 00:33:48,129

4 tell the judge and I'm gonna tell the

5 726

6 00:33:45,789 --> 00:33:49,929

7 jury that I think you're a fat fraud I

8 727

9 00:33:48,129 --> 00:33:52,690

10 think you're a fat frog who may have

11 728

12 00:33:49,929 --> 00:33:54,609

13 never fully left the CIA and I think you

14 729

15 00:33:52,690 --> 00:33:56,289

16 have a little scheme to destroy truthers

17 730

18 00:33:54,609 --> 00:33:57,999

19 you don't have the resources to deal

20 731

21 00:33:56,289 --> 00:33:59,830

22 with this shit and that's what I believe

23 732

24 00:33:57,999 --> 00:34:02,109

25 that's what I truly believe at this

26 733

27 00:33:59,830 --> 00:34:03,999

28 point in time given the information that

734

00:34:02,109 --> 00:34:05,950

we've surfaced and so if you're to have

735

00:34:03,999 --> 00:34:08,619

me testify in your court case Robert

1 736

00:34:05,950 --> 00:34:10,599

2 David Steele you fat swamp hog you

3 737

4 00:34:08,619 --> 00:34:13,960

5 already have me testify I don't think

6 738

00:34:10,599 --> 00:34:15,639

7 it'd work out in your favor and I think

8 739

9 00:34:13,960 --> 00:34:18,129

10 you're an anti-semite Robert David

11 740

00:34:15,639 --> 00:34:20,290

12 Steele your random outbursts about Jews

13 741

14 00:34:18,129 --> 00:34:22,359

15 and stuff I don't think testifying would

16 742

00:34:20,290 --> 00:34:25,270

17 really go in your favorite and I'm not a

18 743

00:34:22,359 --> 00:34:27,520

19 person who really cares not a person who

20 744

21 00:34:25,270 --> 00:34:30,129

22 cares that much when people criticize my

23 745

00:34:27,520 --> 00:34:32,559

24 my background I don't really care they

25 746

26 00:34:30,129 --> 00:34:35,559

27 just the whole the whole cake together

28 747

00:34:32,559 --> 00:34:37,869

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 85

1 this fat hog this fat hog go he's

2 748

3 00:34:35,559 --> 00:34:40,389

4 rambling about AIPAC and the Israelis

5 749

6 00:34:37,869 --> 00:34:43,030

7 and stuff this fat hog tried to destroy

8 750

9 00:34:40,389 --> 00:34:45,429

10 me it appears just because I read put us

11 751

12 00:34:43,030 --> 00:34:49,419

13 as emails and it appears that he also

14 752

15 00:34:45,429 --> 00:34:50,770

16 misled Tim home set and when when he

17 753

18 00:34:49,419 --> 00:34:53,109

19 says I don't like where this is leading

20 754

21 00:34:50,770 --> 00:34:54,940

22 and then it starts yelling at me and

23 755

24 00:34:53,109 --> 00:34:58,089

25 hangs up I don't like where this is

26 756

27 00:34:54,940 --> 00:35:00,250

28 heading what does that even mean I'm not

757

00:34:58,089 --> 00:35:01,359

a prosecutor you start freaking out on

758

00:35:00,250 --> 00:35:02,290

me and said I don't like where this is

1 759

00:35:01,359 --> 00:35:04,930

2 going

3 760

4 00:35:02,290 --> 00:35:07,750

5 where is this going wait a second wait a

6 761

7 00:35:04,930 --> 00:35:10,930

8 second here huh let me be Columbo for a

9 762

10 00:35:07,750 --> 00:35:13,660

11 second one more question mr. Steele are

12 763

13 00:35:10,930 --> 00:35:16,000

14 you referring truthers who cover Podesta

15 764

16 00:35:13,660 --> 00:35:19,720

17 and the Clintons to expensive

18 765

19 00:35:16,000 --> 00:35:21,910

20 complicated litigation with with with

21 766

22 00:35:19,720 --> 00:35:24,190

23 this are you referring them it's a

24 767

25 00:35:21,910 --> 00:35:26,710

26 complex litigation for the sole intent

27 768

28 00:35:24,190 --> 00:35:36,460

of bringing those people down simple

769

00:35:26,710 --> 00:35:39,160

question but I don't mean to seem like a

770

00:35:36,460 --> 00:35:41,140

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 87

1 snowflake retiring on you guys don't

2 771

3 00:35:39,160 --> 00:35:44,140
mean to be a snowflake it's after

4 772

5 00:35:41,140 --> 00:35:45,820
6 finding out that he used to you sort

7 773

8 00:35:44,140 --> 00:35:46,330
with the Clintons I can't deal with this

9 774

10 00:35:45,820 --> 00:35:48,250
11 anymore

12 775

13 00:35:46,330 --> 00:35:50,020
I don't I'm done with videos just doing

14 776

15 00:35:48,250 --> 00:35:52,330
16 this there's a public record of what was

17 777

18 00:35:50,020 --> 00:35:53,740
done to me I'm done with this keep

19 778

20 00:35:52,330 --> 00:35:55,720
reading the website because we're gonna

21 779

22 00:35:53,740 --> 00:35:57,880
23 we're gonna keep putting articles out on

24 780

25 00:35:55,720 --> 00:36:01,870
their article coming out tomorrow night

26 781

27 00:35:57,880 --> 00:36:04,060
28 a new one on the homepage and as far as

1 782

00:36:01,870 --> 00:36:07,420

2 me I'm done you know this is no longer

3 783

4 00:36:04,060 --> 00:36:09,070

5 fun for me if I had a fear of death

6 784

00:36:07,420 --> 00:36:10,660

7 would be a little bit scary but I don't

8 785

9 00:36:09,070 --> 00:36:12,100

10 these peda bores I don't like what

11 786

00:36:10,660 --> 00:36:14,200

12 they've done don't like they've done

13 787

14 00:36:12,100 --> 00:36:16,270

15 with my country or with the political

16 788

00:36:14,200 --> 00:36:17,830

17 situation and I don't fear them even a

18 789

00:36:16,270 --> 00:36:19,540

19 little bit and if they were to come here

20 790

21 00:36:17,830 --> 00:36:24,640

22 and try to harm me I don't think you

23 791

00:36:19,540 --> 00:36:26,980

24 would n12 for them and I appreciate the

25 792

26 00:36:24,640 --> 00:36:27,790

support so far but I know this is where

27 793

28 00:36:26,980 --> 00:36:30,460

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 89

1 it ends for me

2 794

3 00:36:27,790 --> 00:36:32,290

4 these I put my faith in this man Stephen

5 795

6 00:36:30,460 --> 00:36:33,970

7 Scott this I put a lot of faith in him

8 796

9 00:36:32,290 --> 00:36:35,650

10 that I normally would not put in the

11 797

12 00:36:33,970 --> 00:36:38,980

13 person that I don't know that well the

14 798

15 00:36:35,650 --> 00:36:40,810

16 Robert Steele and Steve this is wife

17 799

18 00:36:38,980 --> 00:36:43,570

19 telling me how much they care about my

20 800

21 00:36:40,810 --> 00:36:46,900

22 journalism I bought it hook line and

23 801

24 00:36:43,570 --> 00:36:48,760

25 sinker auto hook line and sinker and I

26 802

27 00:36:46,900 --> 00:36:51,220

28 was almost taken to the slaughter

803

00:36:48,760 --> 00:36:53,470

thankfully some strong intuition

804

00:36:51,220 --> 00:36:56,320

combined with a few watchful protectors

1 805

00:36:53,470 --> 00:36:57,040

2 it is true that not everybody in DC is

3 806

4 00:36:56,320 --> 00:36:58,900

5 total garbage

6 807

00:36:57,040 --> 00:37:03,100

7 because I have some watch the protectors

8 808

9 00:36:58,900 --> 00:37:06,670

10 who said hey this is not this is not

11 809

00:37:03,100 --> 00:37:08,230

12 adding up at all you know and thankfully

13 810

00:37:06,670 --> 00:37:10,030

14 I have those people to say you got a

15 811

16 00:37:08,230 --> 00:37:11,410

17 look you gotta look at the downside like

18 812

00:37:10,030 --> 00:37:13,570

19 that former judge telling me that I

20 813

21 00:37:11,410 --> 00:37:15,850

22 could have been hit then have been hit

23 814

00:37:13,570 --> 00:37:18,370

24 with with fines for go

25 815

00:37:15,850 --> 00:37:20,710

26 in their pro se I kiss a case this

27 816

28 00:37:18,370 --> 00:37:22,720

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 91

EXHIBIT C

Transcript of phone interview with General William Kernan

1

00:00:00,030 --> 00:00:06,060

morning general Kernan can you hear me alright? I can yeah okay thank you

2

00:00:06,060 --> 00:00:14,969

for speaking with me yeah no problem there's a slight delay what I've

3

00:00:14,969 --> 00:00:23,519

basically got a hole in my spinal cord from parachuting and it puts blood on my

4

00:00:23,519 --> 00:00:32,820

brain and is basically robbing my my hearing but have trouble fixing this

5

00:00:32,820 --> 00:00:38,600

thing so you just have to bear with me here I'm very sorry to hear that

6

00:00:41,510 --> 00:00:45,210

well just something I got to deal with yeah

7

00:00:45,210 --> 00:00:50,789

before we begin sir do I have your permission to record the call so I can

8

00:00:50,789 --> 00:00:55,620

make a transcript that will be used as evidence in this lawsuit against me

9

00:00:55,620 --> 00:00:58,340

coming from Robert David Steele

10

00:00:58,340 --> 00:01:01,720

Yeah sure no problem

11

00:01:01,720 --> 00:01:05,060

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 103

1 okay

2 have you had an opportunity to review 12

3 00:01:05,180 --> 00:01:10,320

4 this document background information on Robert David Steele and the other people

5 13

6 00:01:10,320 --> 00:01:18,689

7 were going to talk about yeah I did review what you sent me today had an

8 14

9 00:01:18,689 --> 00:01:29,090

10 opportunity to to look through it little convoluted here is what appears to be a

11 15

12 00:01:29,090 --> 00:01:35,880

13 real screwy situation with this guy you know yeah so you don't recognize this

14 16

15 00:01:35,880 --> 00:01:40,020

16 individual you never worked with him in the development of the NATO open-source

17 17

18 00:01:40,020 --> 00:01:47,520

19 intelligence handbook as he claims

20 I do not know this guy as far as I know

21 18

22 00:01:47,520 --> 00:01:54,500

23 I may have run across him but I do not know Steele or any of the other people

24 19

25 00:01:54,509 --> 00:02:00,080

26 that that you sent me information on right but of course in the book the NATO

27 20

28 00:02:00,090 --> 00:02:04,680

open-source intelligence handbook you reference this open source solutions

21 21

22 00:02:04,680 --> 00:02:09,680

23 company as a contributor is that correct?

24 22

25 00:02:09,680 --> 00:02:20,760

26 the the pamphlet that that was done by SACLANT was a collaborative effort by

27 DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 104

1 23

2
3 00:02:20,770 --> 00:02:30,390
the the SACLANT staff which of course was a multinational staff that was done

4 24

5 00:02:30,390 --> 00:02:41,560
6 for the the joint and multinational command that that I commanded of course

7 25

8 00:02:41,560 --> 00:02:47,620
I put the forward on it I was asked if I wrote that I did not it was a

9 26

10 00:02:47,620 --> 00:02:55,240
11 collaborative effort by by the SACLANT staff right and in this paragraph

12 27

13 00:02:55,240 --> 00:03:01,540
in your forward you say this publication has benefited greatly from the continued

14 28

15 00:03:01,540 --> 00:03:07,810
16 collaboration between my staff and the staff of open source solutions inc I

17 29

18 00:03:07,810 --> 00:03:12,880
think this is the main source of disagreement between Robert David Steele

19 30

20 00:03:12,960 --> 00:03:20,260
and the reporting that we've done he claims that he is somehow part of open

21 31

22 00:03:20,260 --> 00:03:28,520
23 source solutions but I'm unable to find
any information online to corroborate what he says

24 32

25 00:03:30,720 --> 00:03:38,860
26 well I know nothing about Steele having anything to do with writing this and I

27 33

28 00:03:38,860 --> 00:03:47,010
saw where he claimed that he wrote 85% of this I find that very hard to believe

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 105

1 34

2
3 00:03:47,010 --> 00:03:53,680
4 unquestionably we do use contractors from time to time but given the type of

5 35

6 00:03:53,680 --> 00:03:58,720
7 document of course I'm going back eighteen years now but given the type of

8 36

9 00:03:58,720 --> 00:04:04,600
10 document that that was we would have used the subject matter experts from the

11 37

12 00:04:04,600 --> 00:04:09,580
13 SACLANT staff to put that document together so the notion that one

14 38

15 00:04:09,580 --> 00:04:14,680
16 individual would have written 85% of it is not compatible with what you're

17 39

18 00:04:14,680 --> 00:04:17,380
19 describing right?

20 40

21 00:04:17,460 --> 00:04:24,160
22 oh no
23 I find it highly unlikely that one

24 41

25 00:04:24,360 --> 00:04:31,000
26 person could have written that it is too complex a document for one individual to

27 42

28 00:04:31,000 --> 00:04:35,120
29 have written that too many different disciplines and things like that this is

30 43

31 00:04:35,220 --> 00:04:39,300
32 a document over 50 pages

33 44

34 00:04:39,300 --> 00:04:42,060
35 I'm sorry say that again

1 45

2 00:04:42,060 --> 00:04:44,600

3 it's a it's a lengthy document over 50 pages and I

4 46

5 00:04:44,720 --> 00:04:49,759

6 presume it covers too many different subjects for one person to have written

7 47

8 00:04:49,759 --> 00:04:55,220

9 the whole thing that's correct

10 this would have been this would have

11 48

12 00:04:55,220 --> 00:05:02,330

13 been done by various people within the staff that had staff expertise in the

14 49

15 00:05:02,330 --> 00:05:08,660

16 various areas of that of that document it was like I said it would have been a

17 50

18 00:05:08,660 --> 00:05:13,460

19 collaborative effort it would have been staffed numerous times within the within

20 51

21 00:05:13,460 --> 00:05:20,160

22 the headquarters and then subsequently approved by the by the chief of staff

23 52

24 00:05:20,160 --> 00:05:27,460

25 before it went to me for final approval mm-hmm and do you recall speaking well

26 53

27 00:05:27,470 --> 00:05:32,060

28 sorry it was an email communication with this person who presented herself as Pat

54

00:05:32,060 --> 00:05:39,260

Ingraham who I believe is Susan Lutzke you remember that email exchange right?

55

00:05:39,280 --> 00:05:47,380

Yeah, I just vaguely remember that that conversation or email

1 56

2 00:05:47,380 --> 00:05:52,340

3 I don't recall whether it was a

4 telephone conversation or an email but I

5 57

6 00:05:52,340 --> 00:05:58,130

7 was basically asked if if I wrote that and I think I told her or the same thing

8 58

9 00:05:58,130 --> 00:06:06,500

10 that all I did was put the forward on it that this was a staff effort by by

11 59

12 00:06:06,500 --> 00:06:10,460

13 SACLANT yeah

14 separately I've been in touch with Susan

15 60

16 00:06:10,460 --> 00:06:14,820

17 Lutzke she's shared the email between you and

18 61

19 00:06:14,820 --> 00:06:19,460

20 her that's how I got your email address that's how you and I got in touch for

21 62

22 00:06:19,460 --> 00:06:23,020

23 this phone call so I believe she was deceiving you there and I'm not sure

24 63

25 00:06:23,020 --> 00:06:28,180

26 exactly what her purpose was but she is not Pat Ingraham

27 64

28 00:06:29,160 --> 00:06:33,520

Yeah I was very surprised

65

00:06:33,620 --> 00:06:42,620

when I got that that request from her these documents these manuals and staff

66

00:06:42,620 --> 00:06:51,080

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 108

1 documents are always done as a collaborative effort by the staff you

2 67

3 00:06:51,080 --> 00:06:58,099

4 know as a commander I might sign off on it to bring attention to the fact that

5 68

6 00:06:58,099 --> 00:07:04,580

7 this is an important document and approved at at the headquarters level

8 69

9 00:07:04,580 --> 00:07:13,130

10 but obviously it's not something that that me as the commander wrote right and

11 70

12 00:07:13,130 --> 00:07:17,900

13 would you have directly interfaced with individuals who did write it or you're

14 71

15 00:07:17,900 --> 00:07:21,820

16 just sort of overseeing it as a project?

17 72

18 00:07:22,380 --> 00:07:33,560

19 right okay hang on just a minute my phone that captures your voice

20 73

21 00:07:33,560 --> 00:07:42,340

22 message is being delayed but... I can rephrase I don't know why this

23 74

24 00:07:42,340 --> 00:07:50,500

25 individual would would indicate that he wrote this because these these type

26 75

27 00:07:50,500 --> 00:07:58,140

28 manuals are always something that that is done at a staff level I see I see

76

00:07:58,160 --> 00:08:04,510

and the third individual David George Sweigert retired US Air Force and

77

00:08:04,510 --> 00:08:09,900

contract employee of various agencies have you ever seen this guy before?

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 109

1 78

2 00:08:11,060 --> 00:08:14,740

3 I don't know this individual at all

4 79

5 00:08:14,780 --> 00:08:21,100

6 yeah I mean I you know you've got good pictures on him and everything else

7 80

8 00:08:21,100 --> 00:08:29,150

9 obviously somebody that also was a defense contractor from time to time he

10 81

11 00:08:29,150 --> 00:08:33,560

12 could have been in the headquarters but I never I never recalled meeting him or

13 82

14 00:08:33,560 --> 00:08:40,920

15 seeing him

16 could've he had a a periodic contract

17 83

18 00:08:40,920 --> 00:08:45,660

19 at Booz Allen Hamilton or somebody like that working in the headquarters yes but

20 84

21 00:08:45,660 --> 00:08:50,130

22 I don't I don't remember ever meeting him of course I'm just trying to

23 85

24 00:08:50,130 --> 00:08:54,300

25 determine why these individuals would have selected this book I mean they're

26 86

27 00:08:54,300 --> 00:09:01,019

28 so persistent in their efforts to stop me from reporting on things their

87

00:09:01,019 --> 00:09:06,600

explanation of simply not liking my news program can't possibly be the real

88

00:09:06,600 --> 00:09:11,550

explanation for their multiple lawsuits they've brought against me and constant

1 89

00:09:11,560 --> 00:09:15,020

2 harassment and defamation

3 so listen General thank you very much

4 90

5 00:09:15,020 --> 00:09:18,320

6 for your time I think that's really all I needed to ask you I really appreciate

7 91

8 00:09:18,320 --> 00:09:25,320

9 you sharing that information with me and I hope you feel alright and can get

10 92

11 00:09:25,320 --> 00:09:28,000

12 some treatment for this condition

13 93

14 00:09:28,900 --> 00:09:32,380

15 yes it's always upsetting when

16 94

17 00:09:32,380 --> 00:09:38,000

18 people take credit for other people's work why somebody unless they're just

19 95

20 00:09:38,000 --> 00:09:46,860

21 trying to fatten their resume by taking credit for something like this is beyond

22 96

23 00:09:46,860 --> 00:09:52,290

24 me why somebody would try to take this credit but it's this is obviously a

25 97

26 00:09:52,290 --> 00:10:00,860

27 staff document that was worked for months and approved by a multinational

28 98

00:10:00,860 --> 00:10:10,380

headquarters so I it's just absolutely beyond a doubt something that the

99

00:10:10,380 --> 00:10:15,920

headquarters put together are not one

individual I understand it's too complicated a document

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 111

1 100

2 00:10:15,920 --> 00:10:20,880

3 yeah one last question with regard to the lawyer representing mr. Steele this

4 101

5 00:10:20,880 --> 00:10:25,680

6 Steven s Biss as I mentioned in the document I have reason to believe that

7 102

8 00:10:25,680 --> 00:10:30,750

9 Robert David Steele has put Biss in touch with the House Intelligence

10 103

11 00:10:30,750 --> 00:10:36,320

12 Committee ranking member Devon Nunez and has encouraged Nunez to bring a lawsuit

13 104

14 00:10:36,320 --> 00:10:42,880

15 against the software company social media giant Twitter and various

16 105

17 00:10:42,880 --> 00:10:49,180

18 co-defendants I have reason to suspect Biss is in a regular practice of

19 106

20 00:10:49,190 --> 00:10:53,380

21 engaging in these fraudulent lawsuits and I'm speculating when I say this but

22 107

23 00:10:53,390 --> 00:10:58,580

24 I believe they're targeting mr. Nunez in an effort to damage his reputation

25 108

26 00:10:58,580 --> 00:11:04,130

27 because I've read their lawsuit and it has virtually no hope of succeeding it

28 109

00:11:04,130 --> 00:11:10,700

has already served to basically be the source of ridicule for mr. Nunez who of

110

00:11:10,700 --> 00:11:15,680

course was closely associated with championing president Trump's claims of

111

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 112

1 00:11:15,680 --> 00:11:20,120
2 innocence during the time that the Robert Mueller investigation was going on

3 112
4 00:11:20,120 --> 00:11:24,280
5 do you have any advice as to what i might be able to do to alert mr. Nunez

6 113
7 00:11:24,280 --> 00:11:29,240
8 I've tried contacting his office and no success

9 114
10 00:11:29,520 --> 00:11:31,900
11 that's very disappointing

12 115
13 00:11:32,800 --> 00:11:34,060
14 Yeah

15 116
16 00:11:36,240 --> 00:11:41,320
17 any any advice as to what I might be able to do do you have any contacts who

18 117
19 00:11:41,320 --> 00:11:47,360
20 could possibly raise an alert to mr.
21 Nunez as to the activities of these individuals?

22 118
23 00:11:48,200 --> 00:11:54,660
24 I don't the only thing that
25 I could possibly suggest that there

26 119
27 00:11:54,660 --> 00:12:02,960
28 there may be still a staff trail within SACLANT headquarters of the staffing

120
00:12:02,960 --> 00:12:08,030
of that document even though it's 18 years ago there still could be in the

121
00:12:08,030 --> 00:12:13,700
files you know those things are pretty heavily staffed within the headquarters

1 122

00:12:13,700 --> 00:12:21,290

2 and there may be something still in the files and in SACLANT the staffing of

3 123

4 00:12:21,290 --> 00:12:26,680

5 that document even though it was 18 years ago to show how that thing was

6 124

7 00:12:26,690 --> 00:12:34,460

ultimately approved well yeah I don't know that it would be necessary to go to

8 125

9 00:12:34,460 --> 00:12:40,100

10 those lengths I think your statements here definitely serve to counteract

11 126

00:12:40,100 --> 00:12:45,080

12 Robert David Steele's ridiculous claims and I definitely appreciate your time

13 127

14 00:12:45,080 --> 00:12:48,480

this morning general thank you very much

15 128

16 00:12:48,820 --> 00:12:53,280

17 yeah I mean it is a ridiculous claim but

18 129

19 00:12:53,580 --> 00:12:59,920

but if he's trying to take credit for it and and

20 130

21 00:12:59,930 --> 00:13:06,710

22 trying to use that as the defamation of character against you I mean it may be

23 131

24 00:13:06,710 --> 00:13:11,300

another another outlet for you yeah all right well I appreciate that I will

25 132

26 00:13:11,300 --> 00:13:15,000

27 follow up thank you very much sir have a good morning

28 133

00:13:15,000 --> 00:13:17,340

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 114

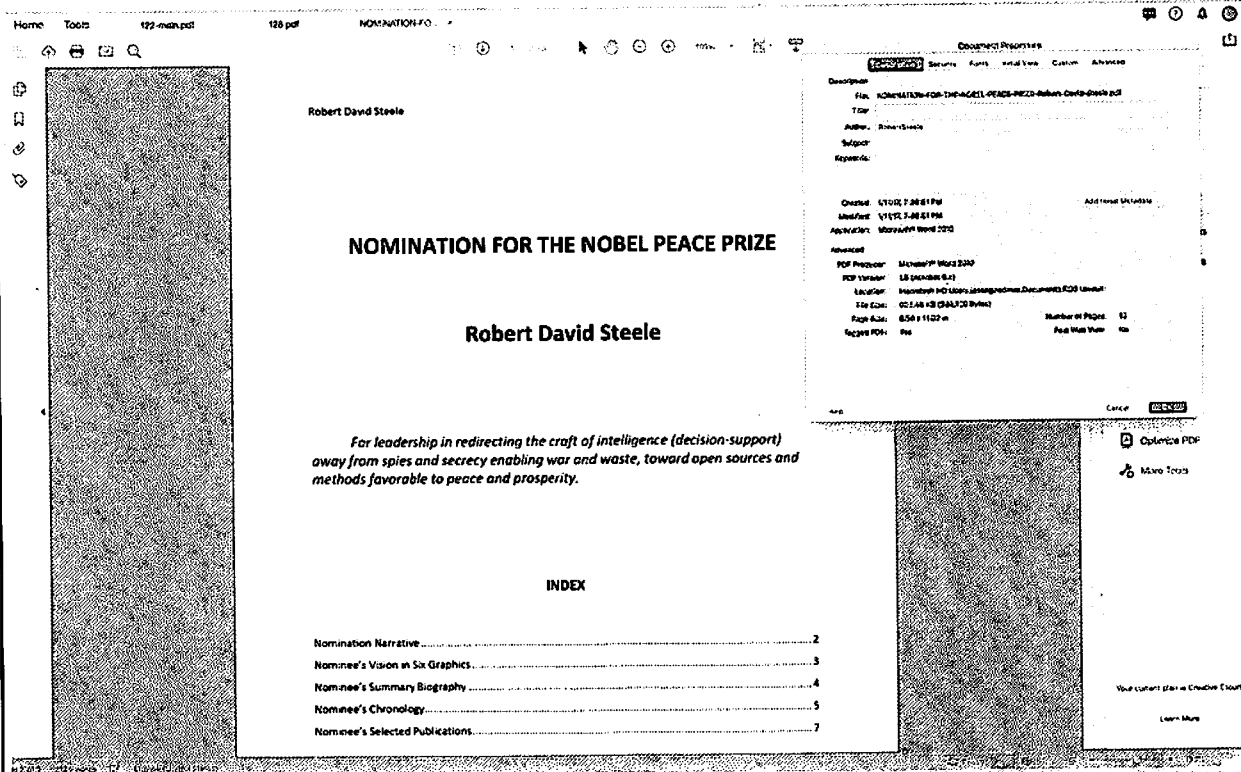
1 okay Jason good luck to you

2 134

3 00:13:17,340 --> 00:13:19,860

4 take care

EXHIBIT D



L PEACE PRIZE

le

EXHIBIT E

From: Defango TV <defango@gmail.com>
 Subject: Fwd: HAZMAT
 Date: June 18, 2019 at 11:41 AM
 To: truth@crowdsourcethetruth.org, dseaman@gmail.com



----- Forwarded message -----

From: Robert Steele <robert.david.steele.vivas@gmail.com>
 Date: Fri, Jun 30, 2017 at 9:53 PM
 Subject: Re: HAZMAT
 To: amethetanya <atanya1111@gmail.com>, Th Stg <stger13@gmail.com>
 Cc: Defango <defango@gmail.com>

Manny, BEFORE the interview, give me a list of eleven truth tellers. I will name them online as credible sources with you being the top one.

On Fri, Jun 30, 2017 at 9:47 PM, amethetanya <atanya1111@gmail.com> wrote:
 mango,

you are a very articulate voice of reason and the fact you live half your life on camera, makes it almost impossible for anyone to lie about you. It is hard to distinguish who is a lunatic and who is a paid who is an attention whore etc... the most prolific source of disinfo is media matters, the david brock, lyn rotheschild pipeline of horse shit. Davids seaman knows a lot about this.

I think manny, you have a much better idea as to who is an authentic genuine than I do. I bought into the david seaman is phony but realized in his interview with you, that I was totally off base.

I would give the following people as the people I firmly believe are using their own judgement but I do want to say... I am wrong a lot. BESIDES MANNY my newscasters would be:

H. A Goodman
 davidT (coffee with dave)

MLordandGod

victurus libertas

William mount

davidseaman

Robert wants 12 good people, these are simply the ones I watch, I think manny is in a far better position to determine who those leaders of the community are. that's my viewer preferences. manny is a part of the community, is getting attacked and knows these people and has outside contact with them, I am simply an observer.

It would be cool if you took regular scheduled time to let people submit accounts they suspect to be disinfo, if they are not they can call in and discuss the accusations but go over all the available fact, and let the viewer decide HUMAN or HAZMAT.

Normal people do not attack people saying things like 'Defango is a bad bad person, I am concerned what he might do to me or my family' that is just not normal. Its also not legal.

because of the medium we have no means to stick a 'CONTAMINATED MATERIALS' label on people.

'until we finish our open source information platform we still have to try to distinguish who is honest'
 what evidence is presented

appeals to emotions vs intellect?

attacks others?

is angered by opposition?

grandiose conclusions... is this 'a huge step for the crowdsourcse community'?

Will not rationally respond to information, when facts are brought up, they will be shout, demean mock but never ever address

scripted story lines/comments

professional production videos (aka morphonius)

entertainment industry connections

attacking discrediting others

no person who watches 'WHO SPOOFED THE SETH RICH FILES' believes him to be authentic. it would be easier to create a new platform that excludes all the rigged data commercials than to separate who is and who is not crazy or paid to be wrong. we all know they are toxic but we cant get rid of them.
 it has become EW tube! we need a NEWTUBE. You cant go back and unring a life. right now they dont have a worry in the

it has become an art. we need a new tool. you can go out and annoy a me, right now they can make a war in the world, they do that for living. a lawsuit would create more diarrhea. at least slow the 10 posts a day. a suit against each person who lies about others and the repeaters= the proceeds would fund the new thing with the proceeds. each fake actor will have to hire their own legal team, pay 20k per person, where they get the money to pay their lawyers will come out in discovery= it's a trap!

WHAT TO DO TO SCARE THEM:

"anyone being harassed and stalked for speaking the truth should send a detailed account of who is cyber harassing you to unrig? legal, if we get enough people and the right set of facts you will be included in the lawsuits we intend to file to expose this happening. put 'crowdstalked' in subject line" I can deal with that and write cases and get them filed if needed. this will really hurt them. Also strongly imply that a new youtube is being created in secret. that will drive them nuts.

WHAT PEOPLE CAN DO TO NOT BE PART OF THE PROBLEM

research. books. collect information without deciding right away and being sure. collect a lot of information. If you talk about pizzagate, point to the people before you. point out the mountains of evidence that already exists. do not repeat an internet rumor. do not decide what is true and false based on the words of another alone. trust your gut feeling that you are being lied to but don't accuse people of things with no evidence.

people are worried about George webb so they don't hear about ted gunderson paul bonacci, caradori. This is being done on a scale that makes hilder look like a novice. hundreds of children go missing from DC each month. make sure they know people have not forgotten what they are working so hard to distract us from.

Tanya
443.875.6091

--
#UNRIG: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

EXHIBIT F

From: Defango TV <defango@gmail.com>
 Subject: Fwd: Apology again without caveats
 Date: June 18, 2019 at 11:41 AM
 To: truth@crowdsourcethetruth.org, dseaman@gmail.com



----- Forwarded message -----

From: Robert Steele <robert.david.steele.vivas@gmail.com>
 Date: Mon, Dec 4, 2017 at 6:28 PM
 Subject: Re: Apology again without caveats
 To: Defango <defango@gmail.com>

should I ask Tyroan for the access information? Steve asked me not to contact him. what's the least troubling way to "take possession" of the channel? direct from Tyroan?

On Mon, Dec 4, 2017 at 6:27 PM, Defango <defango@gmail.com> wrote:

In the Last month I have generated over 1k in bitcoin posting my content on steemit regularly and using the platform. I have a small channel on steemit with only the posts I have. IF you started just copy and pasting your content over to steemit and kept active you could be doing 3 times that with little to no problem. Steemit just a new platform that people are using for good and it doesn't matter if they are old articles of yours, they still will generate incoming on the platform. its the decentralized platform that your looking for, it has all the things it needed to fully design and use any open source systems. They just need to be created and connected.

On Mon, Dec 4, 2017 at 4:11 PM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
 PLEASE calm Tanya for me. You can tell her I am your bitch now (smile)

On Mon, Dec 4, 2017 at 6:00 PM, Defango <defango@gmail.com> wrote:
 Thanks A Lot

I was not my intention to hurt you, but I just wanted to clear the air for many people and it seems we had good stopping point.

Bless you for all you have done and I know things are going to be better in the future. Take some time and collect yourself because January is going to be a very busy time for all of us

The video should be edited down and I will keep myself quite on the subject until it seems like its safe to talk about it. I'm just going all in on deflecting any negative comments from Goodman's crowd. He fell for a trap I set for him and its not looking good for him.

You just need to start posting on steemit. Sure month one will be nothing but if you spend the next month moving over content from your website. I can be honest and saying you could be generating over 7k a month and crypto.

On Mon, Dec 4, 2017 at 10:56 AM, Robert Steele <robert.david.steele.vivas@gmail.com> wrote:
 Bless you. I fucked up and it was not at all my intention to be insulting to you. Absolutely NOT.

I will do whatever you wish including if you direct me, posting an apology with no caveats at the video (which you can leave up or not as you please) and doing a future live stream or not. I am about to disappear from public view for 30 days, from Saturday.

I will not mention the video again. If asked by another host about it I will say I screwed up and have apologized to you three times, profusely, I was completely in the wrong in how I spoke. Count on me to be honorable with you.

Also, Trevor just reminded me that I had offered you the bus ride, and that is absolutely still yours if you wish. I am waiting on Cynthia to decide about coming back to the USA. I will do an email now cc you that puts this back on the table with her.

On Steemit, I will follow your lead and do whatever you tell me to do.

My heart is lighter for re-connecting with you. It was NEVER my intent to disrespect you or your channel, I was stupid and clumsy.

Robert

On Mon, Dec 4, 2017 at 12:39 PM, Defango <defango@gmail.com> wrote:
 I accept the apology. We will figure what do next.

On Dec 4, 2017 6:18 AM, "Robert Steele" <robert.david.steele.vivas@gmail.com> wrote:
 Mannu

I apologize again, with no caveats. What can I do to make it right? Will hope to hear from you.

Both Steve and Cynthia are united with you and hold me accountable for being completely wrong in this past encounter.

Very respectfully,
Robert

--
#UNRIG Home: <http://unrig.net>
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
#UNRIG Home: <http://unrig.net>
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

[REDACTED]

--
#UNRIG Home: <http://unrig.net>
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

[REDACTED]

--
#UNRIG Home: <http://unrig.net>
#UNRIG Donate: <http://tinyurl.com/IndieGoGo-UNRIG>
Personal Page: <http://robertdavidsteele.com>
Group Blog: <http://phibetaiota.net>
Donate to Non-Profit: <http://paypal.me/EarthIntel>

--
Defango@gmail.com

EXHIBIT G

From: Defango TV defango@gmail.com
 Subject: Fwd: sorry!
 Date: June 18, 2019 at 11:44 AM
 To: truth@crowdsourcethetruth.org, dseaman@gmail.com



----- Forwarded message -----

From: amethetanya <atanya1111@gmail.com>
 Date: Sun, Jul 2, 2017 at 8:49 AM
 Subject: sorry!
 To: Defango <Defango@gmail.com>

So I love Robert but he moves way to fast. I was just having lunch and talking about how viewers discern things and why you are the best one basically (let's face facts you are a good 50 IQ points > rest) I'm slammed busy with life as I'm sure you are but also with kids and a husband (that's like 3 kids) so if him deciding TOMORROW was a pain in your butt I do apologize.

I'm sitting here writing defamation cases for my husband for policemen and thinking I can in three days get you a case against Jason. I'm guessing a half a million bucks they will throw at you to just make it go away = catch it! Robert is the real deal he can go to court for you. And will. that is cool thing about him. He drove 3 hours to come see me on the farm (terrified honestly) and hung out all day, seemingly unaffected my friends showing up and doing bong hits.

I had written the most killer case against jake-crisis-actor-morphonius. I will have Nora (maccoby) send you a copy (I cant). They called her dad a child trafficker, while her whole family is in the hospital (her mom is dying) her brother is a lawyer who repped alefantis against david brock in their "divorce" but apparently HE blackmailed BROCK and is NOT a pedo??? just a fudge packer. NOT THAT THERE'S ANYTHING WRONG WITH THAT***

Max, her brother was the one who eventually would not let her file against morphonius because his corporate overlords didn't want the publicity. the lawsuit he is waving around on his channel, I wrote that. Nora had started trying to help Robert get to trump because she lives like a few doors down from Pense's guards (I call them spear holders because he is a notorious fag) when her family came under intense fire from media matters. THE ONLY person who knew the stuff in the highly produced morphonius pieces was brock. anyways then she got in a huge fight with Robert over the pedo thing, the details of which escape me. So I was a little wary with helping Robert because I think the attack against her family was because they were trying to help him. and I still want to go after media matters, get them off youtube and get the victims of the slander paid.

anyways do contemplate suing Jason, he's likely insured. You have a great case.

TT

***totally is lots wrong with it. poop on the sheets for instance.

--

Defango@gmail.com

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 122

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS - 123

EXHIBIT J

●●○○ AT&T LTE

2:23 PM

57% 2 Messages
Your July 3rd Tour

Found in All Mail Mailbox

**Robert Steele**

7/7/17



To: George Webb

Details

George, for information. A massive law suit is about to be filed against Jason Goodman by a lawyer who specializes in defamation cases. Manny is the one who will be in front, my case will simply be in support. Jason is buried so deep by his own words that we expect Google to shut him down completely -- close his channel and delete all of his videos. Since the videos appear in all states this will be a multi-state filing, done pro



Circuit Court for Eastern Division Virginia**Case No.** 3:17-cv-601-MHL**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name**Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

VS.**Street Address****Apt. #****Street Address****Apt. #**

OAKTON,

VA

22124

(571)

320-8573

New York

NY

10001

(323)

744-7594

City**State****Zip Code****Area****Telephone****City****State****Zip Code****Area****Telephone****Code****Plaintiff****Defendant****CERTIFICATE OF SERVICE****(DOMREL58)**

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy
of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

Title of Document(s)

was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

Address**City** Richmond**State** VA**Zip** 23219July 5, 2019
Date
Signature

Circuit Court for Eastern Division Virginia **Case No.** 3:17-cv-601-MHL**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name**Name**

11005 LANGTON ARMS CT

252 7th avenue

6s

VS.**Street Address****Apt. #****Street Address****Apt. #**

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City**State****Zip Code****Area
Code****Telephone****City****State****Zip Code****Area
Code****Telephone***Plaintiff**Defendant***CERTIFICATE OF SERVICE****(DOMREL58)**

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy
of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

D. George SweigertOpposing Party or His/Her AttorneyPO Box 152**Address**MesaAZ85211**City****State****Zip**

July 5, 2019
Date


Signature

Circuit Court for Eastern Division Virginia **Case No.** 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name
11005 LANGTON ARMS CT
Street Address **Apt. #**
OAKTON, VA 22124 (571) 320-8573
City **State** **Zip Code** **Area Code** **Telephone**

Plaintiff

VS.

Name
252 7th avenue 6s
Street Address **Apt. #**
New York NY 10001 (323) 744-7594
City **State** **Zip Code** **Area Code** **Telephone**

Defendant

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy
of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11
SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

Susan Lutzke Holmes

Opposing Party or His/Her Attorney

2608 Leisure Dr Unit B

Address

City Fort Collins **State** CO **Zip** 80525

July 5, 2019
Date


Signature

Circuit Court for <u>Eastern Division Virginia</u>				Case No. <u>3:17-cv-601-MHL</u>			
City or County							
<u>Robert David Steele and Earth Intelligence Networ</u>				<u>Jason Goodman</u>			
Name				Name			
<u>11005 LANGTON ARMS CT</u>				<u>252 7th avenue</u>			
Street Address				Street Address			
<u>OAKTON, VA 22124 (571) 320-8573</u>				<u>New York NY 10001 (323) 744-7594</u>			
City State Zip Code Area Telephone				City State Zip Code Area Telephone			
Plaintiff				Defendant			

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 5 day of July, 2019, a copy
of the document(s) entitled DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS

Title of Document(s)
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

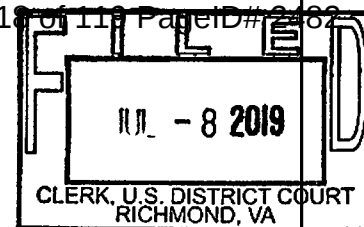
300 West Main Street Suite 102

Address

Charlottesville VA 22903
City State Zip

July 5, 2019
Date


Signature



IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S SWORN STATEMENT

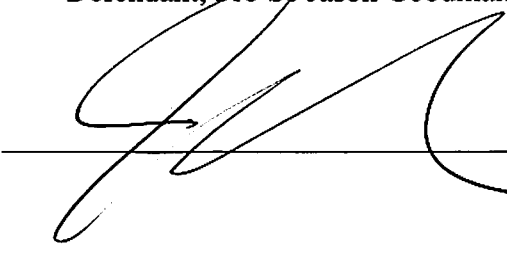
DEFENDANT'S SWORN STATEMENT

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described. Video and telephone recording transcripts may contain typos due to voice to text transcription software. True and accurate copies of original video and audio recordings can be provided should it please the court.

Signed this 5 day of July 2019


Defendant, Pro Se Jason Goodman


Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
truth@crowdsourcethetruth.org

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

DEFENDANT'S AMENDED
RESPONSE TO PLAINTIFF'S
MOTION FOR RULE 11
SANCTIONS

JASON GOODMAN

Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: July 5 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of (Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: (Date)